

Aquaculture Stewardship Council Seriola & Cobia Standard Certification Assessment Report

Kampachi México, S. de R.L. de C.V. + Kampachi King Farm

Onsite Dates: January 29 - February 1, 2019

Public Comment Report To ASC Date: March 10, 2019

Final Report To ASC Date: Pending



PDF 1 Public Disclosure Form

PDF 1.1 Name of CAB

PDF 1.2 Date of Submission

PDF 1.3 SCS Contact Person

PDF 1.3.1 Name of Contact Person

PDF 1.3.2 Title

PDF 1.3.3 Mailing address

PDF 1.3.4 Email address

PDF 1.3.5 Phone number

SCS Global Services, Inc. November 21, 2018

Jason Swecker

Interim Program Manager

2000 Powell Street, Suite 600

Emeryville, CA 94608, United States

jswecker@scsglobalservices.com

+1 (510) 452-8000

PDF 1.4 ASC Name of Client

PDF 1.4.1 Name of Company

PDF 1.4.2 Name of Contact Person

PDF 1.4.3 Title

PDF 1.4.4 Mailing address

PDF 1.4.5 Email address

PFD 1.4.6 Phone number

Kampachi México, S. de R.L. de C.V. Neil Anthony Sims Col. Playa Palo de Santa Rita Sur La Paz, BCS, CP23096 Mexico neil@kampachiworld.com +1 (808) 331-1188

PDF 1.5 Unit of Certification

PDF 1.5.1 Single Site

PDF 1.6 Sites to be audited

Site Name	GPS Coordinates	Species per site	Ownership Status	Initial Audit Dates	Status (new, in production/ fallowing /in harvest)
Kampachi King	110° 36' 22.68" y 110° 37' 15.15" de longitud oeste y los paralelos: 24° 23' 13.20" y 24° 22' 46.80" de latitud norte,	1	Owned	Jan 30 - Feb 1, 2019	In Production

PDF 1.7 Species and Standards

Standard Species (scientific name)		Species (scientific name)	Included in scope (Yes/No)	ASC endorsed standard to be used	Version Number
	Seriola and Cobia	Seriola rivoliana	Yes	N/A	1.0

PDF 1.8 Planned Stakeholder Consultation(s) and How Stakeholders can Become Involved

	Name/organziation	Relevance for this audit	How to involve this stakeholder	When stakeholder may be contacted	How this stakeholder will be contacted
TBD					

PDF 1.9 Proposed Timeline

PDF 1.9.1	Contract Signed:	October 17, 2018
PDF 1.9.2	Start of Audit:	January 30, 2019
PDF 1.9.3	Onsite Audit(s):	January 30 - February 1, 2019
PDF 1.9.4	Certificate Decision:	May 6, 2019

PDF 1.10 Audit Team

	Role	Name
PDF 1.10.1	Lead Auditor	Juan Aguirre
PDF 1.10.2	Technical Expert(s)	Juan Aguirre
PDF 1.10.3	Social Auditor	Osiris Plata

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ASC Audit Report - Opening

1 Title Page / Página de Título

- 1.1 Name of Client/Nombre del cliente
- 1.2 Report Title/Título del Reporte
- 1.3 CAB Name/Nombre del OC
- 1.4 Name of Lead Auditor/Nombre del Aditor Líder
- 1.5 Names and Positions of Report Authors and Reviewers/Nombres y cargos de los autores de los reportes y revisores
- 1.6 Client Contact Name & Title / Nombre y Neil Anthony Sims título del contacto del cliente
- 1.7 Date/Fecha

Kampachi México, S. de R.L. de C.V.

Draft Report for Public Comment

SCS Global Services, Inc.

Juan Aguirre

Technical Expert: Juan Aguirre Social Auditor: Osiris Plata Technical Reviewer: Jason Swecker Certification Decision By:

CSO/Director Cientifico

March 12, 2019

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Section 3: Audit Report Opening / Sección 3: Auditoría Informe de Apertura

Section 4: Non-conformity Report / Sección 4: informe de incumplimiento

Section 5: Audit Report Checklist / Sección 5: Lista de verificación del informe de auditoría

Section 6: Audit Report - Traceability / Sección 6: Informe de auditoría - Trazabilidad

Section 7: Audit Report Summary / Sección 7: Resumen del informe de auditoría

APPENDIX A: Full Stakeholder Comments / APENDICE A: Comentarios de las partes interesadas

3 Glossary / Glosario

Terms and abbreviations that are specific to this audit report and that are not otherwise defined in the ASC glossary.

Términos y abreviaciones específicas para este reporte de auditoría, no están definidos en el glosario de la ASC

ABM - Area-Based Management / Area Base de Manejo

BOD - Biochemical Oxygen Demand / Demanda Bioquímica de Oxígeno

OC - Certification organization / Organización de certificación

DO - Dissolved Oxygen / Oxígeno Disuelto

HACCP – Hazard Analysis and Critical Control Points / Análisis de Peligros y Puntos Críticos de Control

OIE - World Organization for Animal Health / Organización Mundial de Salud Animal

PMV - Veterinary Medical prescription / Prescripción Medico Veterinaria

WHO – World Health Organization / Organización Mundial de la Salud

RT- retention time/ Timpo de regencion

CT- Clearance time/ Periodo de filtracion

INFA -

SERNAPESCA- Servicio Nacional de Pesca

4 Summary / Resumen

A concise summary of the report and findings. The summary shall be written to be readable to the stakeholders and other interested parties. Un resumen conciso del reporte y hallazgos. El resumen deberá ser escrito de tal forma que sea leíble por los grupos de interés y otras partes interesadas.

4.1 A brief description of the scope of the audit / Una breve descripción del alcance de la auditoría

Initial certification of marine farming of Seriola rivoliana; facilities include one marine concession, plus several land based facilities: hatchery, broodstock, research, etc.

Certificación inicial de cultivo en alta mar de Seriola rivoliana; la operacion incluye una concesión marina, más varias instalaciones terrestres: criadero, reproductores, investigación, etc.

4.2 A brief description of the operations of the unit of certification / Una breve descripción de las operaciones del solicitante

Kampachi King cultiva S. rivoliana en una concesion en Bahia de La Paz, Baja California Sur, Mexico, a 4 millas de la costa, en una profundidad de 70 m; otorgada por SAGARPA para acuicutura comercial, para un maximo de 10.24 ha de produccion en concesion total de 120.0109 ha., en jaulas circulares, sumergibles. AL momento de la auditoria habia 3 jaulas operando.

Kampachi King grows S. rivoliana in a concession in Bahia de La Paz, Baja California Sur, Mexico, 4miles from shore, at a depth of 70 m; granted by SAGARPA for commercial aquaculture, for a maximum of 10.24 ha of production in total concession of 120.0109 ha., in circular cages, submersible. At the time of the audit there were 3 cages operating.

Type of unit of certification / Tipo de 4.3 unidad de certificación

Sitio unico/Single site

Type of audit / Tipo de auditoría 4.4

Certificacion Inicial/ Initial certification

Number of sites included in the unit of certification / Número de sitios incluidos en la unidad de certificación 4.4.1

> Owned by client /propiedad del cliente Subcontracted by client /

> > subcontratado por el cliente

Initial audit - 01/2019

0 1

4.5 A Summary of the Major Findings / Un resumen de los hallazgos mayores

See 12.1 of Closing Section

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5 CAB Contact Information / Información de contacto del OC

- 5.1 CAB Name / Nombre del OC
- CAB Mailing Address / Correo postal del 2000 Powell Street, Suite 600 5.2 OC

5.3 Email Address / Correo electrónico SCS Global Services, Inc.

Emeryville, CA 94608, United States jswecker@scsglobalservices.com

6 Background on the Applicant / Antecedentes sobre el Solicitante

A description of the unit of certification / Una descripción de la unidad de certificación

Kampachi King cultiva S. rivoliana en una concesion en Bahia de La Paz, Baja California Sur, Mexico, a 4 millas de la costa, en una profundidad de 70 m; otorgada por SAGARPA para acuicutura comercial, para un maximo de 10.24 ha de produccion en concesion total de 120.0109 ha., en jaulas circulares, sumergibles. Al momento de la auditoria habia 3 jaulas operando. Se espera llegar a 16 jaulas de engorde.

Kampachi King grows S. rivoliana in a concession in Bahia de La Paz, Baja California Sur, Mexico, 4miles from shore, at a depth of 70 m; granted by SAGARPA for commercial aquaculture, for a maximum of 10.24 ha of production in total concession of 120.0109 ha., in circular cages, submersible. At the time of the audit there were 3 cages operating. A total of 16 cages will be in production at maximum capacity.

- 6.3 Other certifications currently held by the unit of certification / Otras certificaciones realizadas por None/Ninguna el solicitante
- Other certification(s) obtained before this audit / 6.4 Otras certificaciones obtenidas antes de esta auditoría
- 6.5 Estimated annual production volumes of the unit of certification of the current year / Estimación de volúmenes de producción anual de la unidad de certificación
- 6.6 Actual annual production volumes of the unit of certification of the previous year / Los volúmenes de producción anuales reales de la unidad de certificación del año anterior
- Production system(s) employed within the unit of 6.7 certification / Sistema (s) de producción empleados dentro de la unidad de certificación
- 6.8 Number of employees working at the unit of certification / Número de empleados que trabajan en la unidad de certificación
- 6.9 Size and/or # of ponds, pens (if multi site, per site) / Tamaño y / o número de estanques, jaulas (si es un sitio múltiple, por sitio)

None/Ninguna

100 mt

1.2 mt, actual (735 kg)

pen cage/jaulas

48

3 jaulas/ 3 cages, polar circle type, submersible/ tipo polar circle, sumergibles

7 Scope / Alcance

- 7.1 The Standard(s) against which the audit was conducted, including version number / Estándar evaluado durante la auditoría, incluyendo número de
- 7.2 The species produced at the applicant farm / Especie producida en el sitio solicitante
- A description of the scope of the audit including a 7.3 description of whether the unit of certification covers all production or harvest areas managed by the operation or located at the included sites, or whether only a sub-set of these are included in the unit of certification. If only a subset of production or harvest areas are included in the unit of certification these shall be clearly named / Descripción del alcance de la auditoría, incluyendo si es que la unidad de certificación cubre todas las áreas de producción o cosecha, administrados o localizados en el sitio de la operación, o si sólo una parte del sitio está incluída dentro de la unidad de certificación. Si sólo una parte del área de producción o cosecha se incluyen en la unidad de certificación, ésta deberá nombrarse e identificarse claramente.

ASC Seriola/Cobia Standard, Version 1.0 October 2016 Norma ASC Seriola/Cobia, Versión 1.0 Octubre 2016

Seriola rivoliana

Kampachi, Almaco Jack, longfin amberjack, jurel

Initial certification of offshore farming of Seriola rivoliana; facilties include one marine concession, plus several land based facilities: hatchery, broodstock, research, etc. All cages are included in the audit and certification.

Certificación inicial de cultivo en el mar de Seriola rivoliana; la operacion incluye una concesión marina, más varias instalaciones terrestres: criadero, reproductores, investigación, etc. Todas las jaulas estan incluidas en la auditoria y el alcance de la certificacion

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- The names and addresses of any storage, processing, or 7.4 distribution sites included in the operation (including subcontracted operations) that will potentially be handling certified products, up until the point where product enters further chain of custody / Nombres y direcciones de cualquier bodega, sitios de procesamiento o distribución incluídas dentro de la operación (incluyendo operaciones subcontratadas) que puedan manipular producto certificado, hasta el punto en que el producto entre a la posterior cadena de custodia.
- 7.5 Description of the receiving water body(ies) / Descripción del cuerpo de agua receptor en donde se localiza el centro de cultivo

	None
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Bahia de la Paz, Baja California Sur, Mexico. Al este de la peninsula de Baja California, temperaturas varian de 20 a 30 C. La bahía de la Paz se abre hacia el este, en cuya boca se encuentran las islas Espíritu Santo y Partida, en su extremo sur se encuentra el puerto de la ciudad de La Paz capital del estado de Baja California Sur. En la bahía existen una serie de canales con una profundidad de 5 m que permiten la navegación de barcos. Estos canales comunican a la bahía con la ciudad de La Paz.

The bay of La Paz opens towards the east, in whose mouth are the islands Espíritu Santo and Partida, in its extreme south is the port of the city of La Paz, capital of the state of Baja California Sur. Located to the east of Baja California peninsula, water temperatures vary from 20 to 30 C. In the bay there are a series of channels with a depth of 5 m that allow the navigation of boats. These channels connect the bay with the city of La Paz.

8 Audit Plan / Plan de Auditoría

Auditor names and dates for: conducting the audit, 8.1 writing of the report, reviewing the report, and certification decision. Nombres y fechas de los auditores para: realizar la auditoría, redactar el informe, revisar el informe y tomar una decisión sobre la certificación.

Closing Meeting Date - 1 February, 2019 Report Writing Dates -February, 2019 Technical Review Date - 8 - 10 March, 2019 **Certification Decision Date** See 1.5 above

Dates / Fechas

- 8.3 Audit plan as implemented including / Plan de auditoría implementado incluyendo:
 - Desk Reviews / Revisión de escritorio 8.4.1
 - 8.4.2 Onsite audits / Auditoria in situ
 - Stakeholder interviews and community meetings / Entrevistas de las partes interesadas y reuniones
 - 8.4.4 Draft report sent to client / Reporte borrador enviado al cliente
 - 8.4.5 Draft report sent to ASC / Reporte borrador enviado a ASC

November 1, 2018	
	King Kampachi facilities/Instalaciones de King Kampachi, La Paz, Baja California Sur, Mexico
	Hotel Grand Plaza
February 8, 2019	Summary of findings

Locations / Ubicaciones

Names and affiliations of individuals consulted or otherwise | Neil Sims- CSO/Director Cientifico 8.4 involved in the audit including: representatives of the client, employees, contractors, stakeholders and any observers that participated in the audit / Nombres y cargos de las personas que participaron durante el proceso de auditoría. incluyendo: representantes del cliente, empleados, grupos de interés y cualquier otro observador en la auditoría.

Ana Trasviña- Directora de Investigaciones

Ricardo Martinez Castro - Jefe administrativo

Clara García Vela -Gerente administrativo

Mario Vergara -Encargado de proyectos

Personal de Engorda: Hector Ojeda, Martin Pacheco, Noe de León.

March 10, 2019

Personal de Operaciones: Luis Rosales, Daniel Vasquez, Mario Muñoz.

Laboratorio de Piscicultura: Claudia Lechuga Sandoval, Cinthia Grijalva Calderon, Ismael Ortiz Aguirre

Operaciones/Bodega (Pichilingue): Manuel Osuna Garcia, Jesus Manuel Vega Álvarez

Stakeholder submissions, including written or other documented information and CAB written responses to each submission / Envíos de los grupos de interés, incluyendo documentos escritos u otra información documentada, y respuestas escritas del OC a cada uno de los envíos realizados por los grupos de interés.

Name of stakeholder (if permission given to make name public) / Nombre del grupo de interés (si	Relevance to be contacted / Importancia para ser contactado	Date of contact / Fecha del contacto	CAB responded Yes/No / Respuesta del OC Si/No	Brief summary of points Raised / Resumen de los puntos levantados	Use of comment by CAB / Uso de comentarios por el OC	Response sent to stakeholder / Respuesta enviada a los grupos de
_	Coop Progreso de producción Pesquera,	January 31, 2019	Yes/Si	General questions about ASC cert.	Explained process	During meeting
Velazquez Sotelo	SC de RL	January 31, 2013				
M.C. Guadalupe	Gerente. Comité de Sanidad Acuícola de	January 31, 2019	Yes/Si	General questions about ASC cert.		
Armando Leyva	BCS.	January 31, 2013	1 (3) 31		Explained process	During meeting
Phippe Danigo	Gerente Sol Azul (oyster farm) BC	January 31, 2019	Yes/Si	Offered to shar experience with ASC cert.	Thanked	E-mail
Wilber Adman Garcia	Mercado Acuicola La Palizada	January 31, 2019	Yes/Si	· ·	Explained and thanked.	During meeting

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Juan Carlos Perez	CIBNOR	January 31, 2019	1765/Si	<u>'</u>	Explained and thanked.	During meeting
Wilber Adman Garcia	INAPECA CRIP -La Paz	January 31, 2019	Yes/Si	General questions about ASC cert.	Explained and thanked.	During meeting

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AUDIT MANUAL - ASC SERIOLA/COBIA STANDARD

Scope: Seriola quinqueradiata, Seriola dumerili, Seriola rivoliana, Seriola lalandi and cobia Rachycentron canadum

PRINCIPLE 1: COMPLY WITH ALL APPLICABLE INTERNATIONAL, NATIONAL AND LOCAL LAWS AND REGULATIONS

	PRINCIPLE 1: COMPLY WITH ALL APPLICABLE INTERNATIONAL, NATIONAL AND LOCAL LAWS AND REGULATIONS								
		1.1. Criteria: All ap Compliance Criteria:	plicable legal requirements and regulations where farming operation is located Evidence	Evaluation	Description of NC For NCs or N/A	Value/ Metric			
		a. Maintain digital or hard copies of applicable land and water use laws. Provide the audit team with a summary of applicable laws and permit requirements along with contact details for relevant staff.	El centro de cultivo tiene una concesion de SAGARPA para acuicutura comercial, Clave CA/DOGPA-002/2015, con vigencia de 10 anos, de enero 30 2015 a 29 enero 2025, oytorgada a Acuacultivos de Cortez SA de CV -King Kampachi-, incluye coordenadas, para un maximo de 10.24 ha de produccion en concesion total de 120.0109 ha. Tambien se reviso la Resolucion de SEMARNAT						
1.1.1	and national laws and regulations.	b. Maintain original (or certified copies of) lease agreements, land titles and concession permit(s) on file as applicable.	sobre Manifestacion de Impacto Ambiental de concesion a Acuacultivos de Cortez, febrero 24 2014, que incluye impactos ambientales, medidas de mitigacion, condiciones de uso, abandono, etc. Exp. 03-MP0092/11/13I para un proyecto de 120 ha, de las cuales solamente el 4.33% sera utilizada para engorda cuando el proyecto alcance su maxima capacidad. Tambien existe una Aprobacion para modificar una condicion (de instalar cultivos de organismos filtradores) y	Compliant					
	Applicability: All.	c. Keep records of inspections for compliance with national and local laws and regulations (only if such inspections are legally required in the country of operation).	remplazar por medidas de optimizacion de alimentacion mediante camaras y sensores; de diciembre 21 2018. Se reviso el Acta de personeros de Acuacultivos de Cortes, notarizada el 20 octubre 2014, y el Acta de comodato para uso de terreno en CIBNOR por Kampachi para instalacion de produccion de alevines de Seriola, 10.000 m2, septiembre 5 2017.						
		d. Others, please describe a. Provide a certificate of tax clearance or tax law							
	Documents demonstrating compliance with all tax laws. Requirement: Yes. Applicability: All.	conformity from local Revenue authority; OR Maintain records of tax payments to appropriate authorities (e.g. land use tax, water use tax, revenue tax). Note that CABs will not disclose confidential tax information unless client is required to or chooses to make it public. b. Demonstrate that the farm ensures compliance with tax	Se reviso un "Certificado de Secretaria de hacienda y credito Publico", que dice lo siguiente: Nombre, Denominación o Razón social: KAMPACHI FARMS MEXICO S DE RL DE CV, Estimado contribuyente:, Respuesta de opinión:, En atención a su consulta sobre el Cumplimiento de Obligaciones, se le informa lo siguiente: En los controles electrónicos institucionales del Servicio de Administración Tributaria, se observa que en el momento en que se realiza esta revisión, se encuentra al corriente con las obligaciones relacionadas con la inscripción al Registro Federal de Contribuyentes, la presentación de						
1.1.2			declaraciones y no se registran créditos fiscales firmes a su cargo, por lo anterior se emite opinión Positiva. La presente opinión se realiza únicamente verificando que se tengan presentadas las declaraciones, sin que sea una constancia del correcto entero de los impuestos declarados, para lo cual el SAT se reserva sus facultades de verificación previstas en el Código Fiscal de la Federación. Revisión practicada el día 31 de diciembre de 2018, a las 09:30 horas.	Compliant					
		should present information to this effect. d. Others, please describe							
	Documents demonstrating	a. Demonstrate how the farm conforms with the requirements of national and regional/local labor codes and employment law.	La "Ley Federal del Trabajo" de México cumple con todos los criterios de la norma ASC. Basado en entrevista a personal administrativo y trabajadores de la empresa, revisión de registros de nomina, la empresa cumple con las Ley Federal del Trabajo y la Ley del Seguro Social.						
1.1.3	Requirement: Yes. Applicability: All.	b. Keep records of farm inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation).	The Mexican "Ley Federal del Trabajo" meets all of the criteria of the ASC standard. Based on interviews with administrative staff and company workers, review of payroll records, the company complies with the Federal Labor Law and the Social Security Law.	Compliant					
		c. Others, please describe				 			
	Documents demonstrating compliance with regulations and permits concerning water quality	a. Obtain permits for discharge water where applicable.	La Concesion de SAGARPA y la revision de Manifestacion de Impacto Ambiental (MIA) por SEMARNAT, y la Norma oficial Mexicana NOM 001 SEMARNAT incluyen las condiciones de						
1.1.4	impacts.	b. Maintain records of monitoring and compliance with discharge laws and/or regulations as required.c. Maintain records of monitoring and compliance with	operacion y regulaciones con respecto a calidad de aguas. Kampachi presento muestreos realizados con resultados para cumplir con estos requisitos. Existe Permiso para vertimientos dentro del area de concesion otorgado por SEMAR 2014. Se evidencio resultados de analisis para	Compliant					
	Requirement: Yes. Applicability: All.	waste and pollution laws/regulations. d. Others, please describe	varios parametros.						



		PRINCIPLE 2: CONSERVE N	ATURAL HABITAT, LOCAL BIODIVERSITY AND ECOSYSTEM STRUCTURE AND FUNCTION		
			Criterion 2.1 Benthic biodiversity and benthic effects		
2.1.1	TOC, sulphide, or redox levels in	in the Seriola and Cobia Standards (i.e. at the time of peak cage biomass and at all required stations). e. For option #1, measure and record redox potential (mV) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method. f. For option #2, measure and record sulphide concentration (uM) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method. g. For option #3, measure and record Total Organic Carbon (e.g. % by weight) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method. h. Others, please describe	La finca ha seleccionado tres puntos para muestreos y ha realizados mediciones de COT, Sulfuro y redox, por el momento escoge COT. La finca todavia no tiene un AZE especifico y por lo tanto esta usando los lineamientos basados en profundidad del sitio (70 m), por lo cual el AZE temporal es de 175 m, y el punto de refrencia esta a 500 m de las jaulas. No hay diferencias signigicativas entre los puntos de muestreo. No hay diferencias significativas en ninguno de los parametros. The farm has selected three points for sampling and has made measurements of TOC, Sulphide and redox, for the moment it chooses TOC. The farm still does not have a site specific AZE yet and therefore is using the guidelines based on depth of the site (70 m), thus the temporary AZE is 175 m, and the reference point is 500 m away from the cages. There are no significant differences between the sampling points. There are no significant differences in any of the parameters.	Compliant	
2.1.2	noxious) macrofauna immediately outside of AZE attributable to farm operations as evidenced by control. Requirement: No significant change in harmful macrofauna at	standards): Prepare a map of the farm showing GPS locations of all sediment-sampling stations b. If benthos throughout the full AZE is hard bottom, provide evidence to SCS and request an exemption from 2.1.1a-g, and 2.1.2. c. Inform SCS of which indicator the farm has selected for evaluating and monitoring benthic impact. d. Analyze epifaunal and infaunal components of sediment samples including identification to species level and enumeration of all species, for all sampling stations.	No hay diferencias significativa en la abundancia ni composicion de la macrofauna entre el borde del AZE y el sitio de control. Se han enumerado especies e identificado hasta nivel de genero. Se realizaron 4 muestreos por regulaciones mexicanas, desde julio 2018 a septiembre 2018. There is no significant difference in the abundance or composition of the macrofauna between the AZE border and the control site. Species have been listed and identified up to gender level. There were 4 samplings by Mexican regulations, from July 2018 to September 2018.	Compliant	



			Criterion 2.2 Water quality in and near the site of operation		
2.2.1	Turbidity levels in the water column inside and outside AZE. Requirement: No significant change in turbidity levels in the water column at the edge of the AZE in comparison to the control site. Applicability: All.	c. Conduct analysis of turbidity data for statistically	Ver 2.1.1, no hay diferencias significativas. See 2.1.1, there are no significant differences.	Compliant	
2.2.2	Ammonia levels in the water column inside and outside AZE. Requirement: No significant change in ammonia levels in the water column at the edge of the AZE in comparison to the control site. Applicability: All.	f. Others, please describe a. Devise appropriate and detailed ammonia monitoring procedure with detailed maps of sampling points and methodology. The monitoring action must be appropriate for size and scale of the impact and if the farm can prove low impact over a year then don't have to monitor so frequently afterwards b. Measure and record ammonia initially on a monthly basis at the edge of the Allowable Zone of Effect and at an unimpacted reference (control) site far removed from the influence of a farm. c. Conduct analysis of ammonia data for statistically significant difference (95% C.I.) between ammonia levels at the edge of the AZE and at one or more control sites far removed from any potential farm influence. d. Provide results of statistical analysis for initial 12 month ammonia monitoring. e. Implement annual ammonia monitoring procedure. f. Others, please describe	Ver 2.1.1, no hay diferencias significativas. See 2.1.1, there are no significant differences.	Compliant	
			erion 2.3 Interaction with critical or sensitive habitats and species		
2.3.1	Evidence of an assessment of the farm's potential impacts on biodiversity and nearby ecosystems that contains at a minimum: a) identification of proximity to critical, sensitive or protected habitats and species, b) description of the potential impacts the farm might have on biodiversity, with a focus on affected habitats or species, and c) a description of strategies and current and future programs underway to eliminate or minimize any identified impacts the farm might have. Requirement: Yes. Applicability: All.	b. Complete a detailed risk assessment for potential impacts of the farm on critical, sensitive and protected habitats and species. Demonstrate how the farm has strategies and programmes in place that are designed to minimize or eliminate negative impacts on species and habitats.	La finca presento una Manifestacion de Impacto Ambiental, realizada en octubre de 2013, para el cultivo de <i>Seriola</i> (Jurel) en jaulas en San Juan de la Costa, Bahia de la Paz, que incluye todos los	Compliant	



2.3.2	Allowance for the farm to be sited in a legally designated protected area. Requirement: None Applicability: All.	a. Provide a map showing the location of the farm relative to nearby legally protected areas (see footnote 4). b. If the farm is sited in a legally protected area, review the scope of applicability of Indicator 2.3.2a. (see Instructions above) to determine if the farm is allowed an exception to the requirements. If yes, inform SCS and provide supporting evidence. c. Demonstrate that the farm does not conflict with or	El sitio donde se desarrolla el Proyecto, no se encuentra en área natural protegida. De acuerdo al Consejo Nacional de Áreas Naturales Protegidas, en el estado de Baja California Sur existen las siguientes Áreas Naturales Protegidas: The site where the Project is developed, is not in a protected natural area. According to the National Council of Protected Natural Areas, in the state of Baja California Sur there are the following Natural Protected Areas: 1. Reserva de la Biosfera El Vizcaíno 2. Complejo Lagunar Ojo de Liebre 3. Parque Nacional Bahía de Loreto 4. Parque Nacional Archipiélago de Espíritu Santo 5. Reserva de la Biosfera Sierra de La Laguna 6. Parque Nacional Cabo Pulmo 7. Área de Protección de Flora y Fauna Cabo San Lucas 8. Área de Protección de Flora y Fauna Islas del Golfo de California 9. Reserva Ecológica Estatal bajo la categoría de Zona Sujeta a Conservación Ecológica Estero San	Compliant	
		interfere with the operation or integrity of designated parks, limited use protected areas or national preservation areas. d. Others, please describe	José del Cabo El ANP más cercana al proyecto corresponde al Parque Nacional Archipiélago Espíritu Santo, el cual se encuentra a más de 26 km al Este del sitio donde se realiza el cultivo de Jurel. The National Portected Area closest to the project corresponds to Espiritu Santo Archipelago National Park, which is located more than 26 km east of the site where the fish is grown.		
			Criterion 2.4 Interaction with wildlife, including predators		
2.4.1	Acoustic deterrent devices allowed. Requirement: None.	 a. Prepare a written statement affirming that the farm's management is committed to not using acoustic deterrent devices (ADDs) or acoustic harassment devices (AHDs) for control of marine pests and/or predators. b. Compile documentary evidence to show that no ADDs or AHDs are used on the farm (e.g. predator and pest control procedure and evidence of implementation). 	Kampachi Farms México no usa aparatos acusticos para ahuyentar depredadores y presento declaracion afirmando que estan comprometidos a la no utilización de métodos acústicos, ya que reconocen la importancia de la Bahía de La Paz en el tránsito y residencia de mamíferos marinos además de la poca efectividad de estos métodos en el largo plazo. Kampachi Farms Mexico does not use acoustic devices to deter predators and presented a declaration stating that they are committed to the non-use of acoustic methods, since they recognize the importance of La Paz Bay in the transit and residence of marine mammals, as well as	Compliant	
		d. Others, please describe	the ineffectiveness of these methods in the long term.		
		a Provide a list of endangered and red-listed animals	Las especies en la lista roja incluyen al tiburon blanco <i>C. carcharias</i> , tiburon martillo <i>Spyrna</i> sp., caballito d emar <i>H. ingens</i> y lobo marino californiano <i>Z. californiensis</i> . Los impactos esperados		
242	in the farm lease area and adjacent	b. Produce a documented record of the farm's impact on biodiversity and nearby ecosystems. Detail species/habitats, spatial/temporal aspects, type of interaction and outcome.	the MIA report. Kampachi Mexico has procedures for the case of encounters with predators, shark	Compliant	
/ / 4 /		c. Establish list of predators and pests requiring control.		Compilant	
2.4.2	Requirement: 0.				
2.4.2	Requirement: 0. Applicability: All.	Identify clearly the permitted mitigation/control procedures			



2.4.3	against a (non-endangered or non red-listed) predator: 1. All other avenues were pursued prior to using lethal action. 2. Approval was given from a senior manager above the farm manager. Requirement: Yes, unless human safety is immediately threatened. Applicability: All.	a. Provide a company document that sets out the procedure that must be followed prior to lethal resolution of a predator. b. Maintain a log of predator control events that allows for verification of adherence to company procedures regarding predator control.	No han habido interacciones letales contra depredadores. Kampachi Mexico tiene procedimientos-PEO: PLAN DE MANEJO DE DEPREDADORES para el caso de encuentros con depredadores, y formato de registro para cada caso, y bitacora: Bitacora de interacción con vida salvaje: Anexo A. Informe de interacción con depredadores There have been no lethal interactions with predators. Kampachi Mexico has procedures- PEO: DEPREDATORS MANAGEMENT PLAN for the case of encounters with predators, and report form for each case, and log: Log for interaction with wildlife: Annex A. Interaction report with predators	Compliant		
		d. Others, please describe				
		a. Demonstrate that details on lethal predator management events have been transmitted to appropriate/most relevant government oversight agency.			No han habido incidentes letales, de acuerdo a entrevista con personal y registros.	
2.4.4	2. Made easily publicly accessible.	b. Demonstrate that details on lethal predator management events are made available to the public.			No lethal incidents have occurred, according to interviews with workers and logbooks.	
		c. Others, please describe				
	nviaxiiiluili liullibei ol letilai	a. Maintain log of lethal incidents for a minimum of two years. For first audit, > 6 months of data are required.				
2.4.5	Requirement: For birds: 4 lethal	 b. Calculate the total number of lethal incidents involving different species or groups of species (e.g. sharks, birds, marine mammals) during the previous two-year period. c. If the farm can demonstrate valid publicly available 	No han habido incidentes letales. No lethal incidents have occurred.	Compliant		
	incidents. For marine mammals: 1 lethal incident. Applicability: All.	research that whatever is killed is hindering the recovery of any population then it may be exempt from the set requirement number in this indicator. d. Others, please describe				
	probability of lethal incident(s) has	a. Carry out documented review of lethal incidents and revise risk assessment and procedures (see 2.3.1) if necessary / as appropriate.			No han habido incidentes letales.	
2.4.6	taken by the farm to reduce the risk of future incidences.	b. Demonstrate through revision of procedures that management of predators is continually being reviewed with a view to eliminating the need for lethal management.		N/A	No lethal incidents have occurred.	
	Requirement: Yes. Applicability: All.	c. Others, please describe				



		PRINCIPLE 3:	PROTECT THE HEALTH AND GENETIC INTEGRITY OF WILD POPULATIONS					
	Criterion 3.1 Culture of non-native species							
3.1.1	Culture of a non-native species. Requirement: None, unless commercial farming of the species already occurs in the region at time of the first publication of the SCAD standards, or a closed land-based production system with minimal risk of escapes and/or pest and pathogen transfer to wild populations is used. Applicability: All.	a. Confirm to SCS that the farm produces only native species OR. b. If non-native species, provide verifiable evidence that the species was being legally cultured commercially in the country and/or region/state prior to the publishing of the seriola and cobia standard in 2015 OR c. If the farm cannot provide evidence for 3.1.1b, provide documented evidence that the production system is closed to the natural environment and for each of the following: 1) non-native species are separated from wild fish by effective physical barriers that are in place and well maintained;2) barriers ensure there are no escapes of reared fish specimens that might survive and subsequently reproduce; and 3) barriers ensure there are no escapes of biological material that might survive and subsequently reproduce (e.g. UV or other effective treatment) by treating effluent water prior to it exiting the system to the natural environment. d. Others, please describe		Compliant				
			Criterion 3.2 Introduction of transgenic species					
3.2.1	Culture of transgenic fish by the farm. Requirement: None. Applicability: All.	a. Prepare a declaration stating that the farm does not use transgenic stock. b. Maintain records for the origin of all cultured stocks including stocking date, supplier details, and contact person(s) for stock purchases. c. Ensure stock purchase/origin documentation clearly identifies genetic status and whether stock is transgenic or not. d. Others, please describe	King Kampachi compro los reproductores a cooperativas pesqueras locales, Santa Maria y Bahia de la Paz; se revisaron facturas de compras y hoja de control de reproductores. King Kampachi bought its broodstock from local fishing cooperatives, Santa Maria and Bahia de la Paz; purchases invoices and breeders' control sheet were reviewed.	Compliant				



			Criterion 3.3 Escapes			
	For all fish, the operation must have an established plan related to escape management, and adhere to rigorous maintenance procedures and frequent net inspections. Requirement: Yes. Applicability: All.	a. Prepare a Stock Escape Prevention and Management Plan that includes a detailed farm operations risk assessment and submit it to SCS prior to the first audit. The plan should explicitly detail what maintenance procedures are critical and important in the context of avoiding escapes, including but not limited to farm equipment maintenance and frequency of net inspections. b. If the farm operates an open net pen system, ensure the plan (3.3.1a): -clearly identifies the important and critical issues in the context of minimizing escape events; and -sets out clear procedures for ensuring: • net strength testing; • use of appropriate net mesh size; • net traceability; • system robustness; • predator management; • record keeping; • reporting risk events (e.g. holes, infrastructure issues, handling errors); • staff training to cover all of the above areas; and • staff training on escape prevention and counting technologies. c. If the farm operates a closed system, ensure the plan (3.3.1a): -clearly identifies the important and critical issues in the context of minimizing escape events; and -sets out clear procedures for ensuring: • system robustness;- • predator management; • record keeping; • reporting risk events (e.g. holes, infrastructure issues, handling errors); • staff training to cover all of the above areas; and • staff training to cover all of the above areas; and • staff training to cover all of the above areas; and • staff training on escape prevention and counting technologies. d. Maintain records as specified in the plan. e. Train staff on escape prevention planning and management as per the farm's plan. g. Others, please describe	Kampachi tiene un plan de escape de peces: PEO: Plan de Respuesta para Escape de Peces. El plan incluye calidad y prueba de redes, tamano de ojo, manejo de depredadores, registros, ademas usan redes metalicas (de cobre) que son muy eficaces para prevenir escapes y danos a las jaulas. Kampachi has a fish escape plan: PEO: Fish Escape Response Plan. The plan includes quality and test of nets, mesh size, handling of predators, registers; in addition they use metallic cages (copper) that are very effective in	Compliant		
3.3.2	Operations will undertake and maintain detailed records on fish escapes and counting. This will include records of breaches in nets, estimates on escapes and stocked vs. recovered fish counts. Note: farms will also include technology and methodology for undertaking fish counts. Requirement: Yes. Applicability: All.	b. Calculate the unrecorded stock escape as described in	Kampachi ha tenido pequenos escapes por dano de red de nylon, el mayor escape reportado se calcula en 1 500 peces. La adminsitracion tiene conocimeintos de co k relizar lo calculos de perdidas y mortalidades y todos los parametros de poblacion en general, ademas tiene bitacora y registro para escapes y registros semanales de biomasa, individuos, peso, etc., pero la informacion	Minor	Escape information has not been made publicly available. This finding graded Minor as client has shown partial compliance. La informacion de escapes no se ha hecho publica.	



3.3.3	For selectively bred stock or for non-selectively bred stock not from local sources or for wild fingerlings not from local sources more than 2 escape events of 30% (cumulative total fish not recovered) over 2 years . Requirement: No. Applicability: All.	a. Determine whether stocks under culture are selectively bred, non-selectively bred but not from local sources or are from wild fingerlings not collected locally. If none of these apply, requirements 3.3.3 bd. do not apply. b. Where appropriate, maintain monitoring records of all incidences of confirmed or suspected escapes, specifying date, cause, and estimated number of escapees. c. Where appropriate, aggregate cumulative escapes (events and numbers) of all stocks in the most recent production cycle. d. Where appropriate, maintain the monitoring records described in 3.3.3a for at least 10 years beginning with the production cycle for which farm is first applying for certification. e. Others, please describe		N/A	No procede, los reproductores son de origen local. Indicator does not apply, broodstock were sourced locally.	
3.3.4	All escape events of farmed Seriola or Cobia are reported to the pertinent regulatory agency. Requirement: Yes. Applicability: All.	a. Document details of reportable escape events and suspected escape events. Make available details of reportable escapes and make results from 3.3.2b available to regulatory agencies. In absence of regulatory requirement keep the data and make it available for ASC on request.	There is no evidence that escapes are reported; there is no legal obligation, partly because it is a native species, but if there are significant escapes or damages, they report it voluntarily to Profepa or Semarnat.	Compliant		
			Criterion 3.4 Collection of fingerlings			
3.4.1	collected wild fingerlings are harvested from a source fishery with a public fishery assessment, for example FishSource or is in a credible fishery improvement process (FIP) towards an ISEAL compliant fisheries sustainability certification scheme. Requirement: Yes. Applicability: All.	a. Provide details of source fishery from which fingerlings are taken. Provide supporting documentation including purchase orders, invoices, delivery notes etc. that attest to the origin of wild fingerlings. b. Provide FishSource score (www.FishSource.com) for wild fingerling fishery or evidence of MSC certification. If FishSource score or MSC certification is not available, then proceed to 3.4.1 c c. Demonstrate to audit team that the wild fingerling source fishery is in a credible Fisheries Improvement Programme towards an ISEAL compliant fisheries certification scheme d. Others, please describe	No se compra alevines. Todos son producidos en el laboratorio de reproduccion y larvicultura de Kampachi. Se visitaron las instalaciones de reproduccion y alevinaje durante la auditoria. No fingerlings are bought. All are produced in the reproduction and larviculture laboratory of Kampachi. The breeding and nursery facilities were visited during the audit.	Compliant		
3.4.2	Traceability of wild or hatchery purchased or collected fingerlings to their source. Requirement: Yes. Applicability: All.	a. Provide details of hatchery or fishery from which fingerlings are obtained. Provide supporting documentation including purchase orders, transit/movement authorizations, catching vessel details, invoices, delivery notes, stocking records etc. that attest to the origin of all stock present on the farm. c. Others, please describe	No se compran alevines ni juveniles salvajes, todos provienen de las instalaciones de King Kampachi, y se mantienen registros tanto en las areas de reproduccion como por el centro de engorda en mar. King Kampachi does not buy wild fingerlings or juveniles; all come from the facilities of King Kampachi, and records are kept both in the breeding facilities and by the sea farm.	Compliant		



		PRINCIPLE 4: USE R	RESOURCES IN AN ENVIRONMENTALLY EFFICIENT AND RESPONSIBLE MANNER			
			Criterion 4.1 Traceability of marine raw materials in feed			
	Evidence of traceability, demonstrated by the feed producer, of fishmeal and fish oil ingredients. Requirement: Yes. Applicability: All. purchase delivery b. Inform ASC requirement traceability, c. For ea an indeproceed an indeproceed traceability standard traceability standard traceability standard d. Obtain stating the fishmeal	 a. Maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records. b. Inform each feed producer (and supplier) in writing of ASC requirements pertaining to production of feeds and send them a copy of the ASC Seriola and Cobia Standard. 	Records of feed suppliers and purchases provided. The only supplier is EWOS Canada Ltd. EWOS has been BAP certified by SGS for the aquaculture feed scope. Cert. No.M10028, issued on Nov. 6			
4.1.1		c. For each feed producer supplying the farm, confirm that an independent third party audit of the producer has recently been completed against an ISEAL compliant standard that includes an evaluation of feed input traceability. Obtain a copy of the most recent audit report for each feed producer d. Obtain declaration from feed producers and suppliers stating that the company can assure traceability of all fishmeal and fish oil ingredients used in making seriola and cobia diets.	2018. EWOS has been notified of ASC requirements. All feed purchases are recorded and invoices were available for review. Se revisaron los registros de proveedores de alimentos y compras. El único proveedor es EWOS Canada Ltd. EWOS ha sido certificado por BAP por SGS para el alcance de la alimentación acuícola. Cert. No.M10028, emitido el 6 de noviembre de 2018. EWOS ha sido notificado de los requisitos de ASC. Todas las compras de alimentos se registran y las facturas estaban disponibles para revisión.	Compliant		
		f. Others, please describe	Critorian 4.2 Efficient and entireized dista			
	a) Fishineal Forage Fish Dependency	Ta. Ivianitani a uetaneu niventory or the reeu useu that	Criterion 4.2 Efficient and optimized diets			
4.2.1	Fish Dependency Ratio (FFDRo) for Seriola (calculated using formulae in Appendix 1). Kampachi (S. rivoliana, S. dumerili), Hamachi (S. quinqueradiata). b) FFDRm and FFDRo Cobia (calculated using formulae in Appendix 1)	 includes information concerning: Quantities used of each formulation (kg); Percentage of fishmeal and fish oil in each formulation used; Source (fishery) of fishmeal and fish oil in each formulation used; Percentage of fishmeal and fish oil in each formulation derived from trimmings; Supporting documentation and signed declaration from feed supplier. 	Se mantienen los registros para permitir los cálculos de FCR y FFDRm y FFDRo. En el momento de la auditoría, eFCR era 1.31, FFDRm era 1.53 y FFDRo era 1.49.	Compliant		eFCR: 1.31 FFDRm: 1.53
	a) Kampaciii. 11 DKiii 2 2.3/11 DKO 2	b. For FFDRm and FFDRo calculations, exclude fishmeal and/or oil derived from rendering of seafood by-products (e.g. the "trimmings" from a human consumption fishery as per more detailed guidance in Appendix 1.	Records to enable FCR and FFDRm and FFDRo calculations are kept. At the time of the audit, eFCR was 1.31, FFDRm was 1.53 and FFDRo was 1.49			FFDRo: 1.49.
		c. Calculate eFCR using formula in Appendix 1. d. Calculate FFDRm and FFDRo using the relevant formulas in Appendix 1. e. Others, please describe				
	Use of wet feed and moist pellets.	a. Maintain records of wet fish and moist pellet use on the			Farm does not use moist	
4.2.2		farm, where the fish content originated from and where it was caught.		N/A	or wet fish pellets. La finca no usa pellets humedo o mojados.	
	reproductive / till	b. Others, please describe				



			Criterion 4.3 Responsible origin of marine raw materials		
4.3.1	fishmeal or fish oil used in feed to come from fisheries certified under an ISEAL member's accredited certification whose primary goal is to promote ecological sustainability. Requirement: Within 5 years following the date of the publication of the SCAD standards. Applicability: All.	containing fishmeal and fish oil originating from fisheries	Not applicable until 2021 but there is a declaration from Kampachi Mexico and its affiliates stating its commitment to responsible sourcing of fishmeal and fish oil for their fish diets; and states its commitment to source feed components originating from fisheries certified under an ISEAL standard, for a 3 year period starting form the date of the letter. No se aplica hasta 2021, pero hay una declaración de Kampachi México y sus afiliadas que declara su compromiso con el abastecimiento responsable de harina de pescado y aceite de pescado para sus dietas de pescado; y declara su compromiso a usar los componentes de alimentos de origen que se originen en pesquerías certificadas según la norma ISEAL, por un período de 3 años a partir de la fecha de la carta.	Compliant	
4.3.2	biomass category or show evidence of being engaged in a credible and time bound fisheries improvement	a. Obtain documentation from feed producers and/or suppliers that independently confirms the FishSource scores for at least 80% of fishmeal and fish oil used in feed manufacture. OR	Fishmeal is produced from Pacific Southeast Ocean-Southern Peru/Northern Chile - (FAO Zone 87) Anchoveta, Pacific Ocean (FAO Zone 77) thread herring and Gulf of Mexico - US EEZ (3-200 nm from shore) Gulf menhaden. Fish oil comes from Gulf Menhaden. FishSource scores are >6, >6 and 10 respectively. La harina de pescado se produce de anchoveta del Océano Pacífico Sudoriental, Sur de Perú / Norte de Chile - (Zona 87 de la FAO) Anchoveta, sardina crinuda del Océano Pacífico (Zona 77 de la FAO) y menhaden del Golfo de México - EEZ de EE. UU. (3-200 nm desde la costa). El aceite de pescado proviene de Gulf Menhaden. Las puntuaciones de FishSource son> 6, > 6 y 10 respectivamente.	Compliant	
	(excluding fishmeal and oil from byproducts) must meet this criteria.	b. Where FishSource scores are not available for any particular fishmeal or fish oil ingredient/s, compile evidence that attests to the fishmeal and fish oil suppliers being engaged in a credible FIP. c. Others, please describe			
	Feed containing fishmeal and/or fish oil originating from by-products or trimmings from fish species which are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species. Requirement: None. Applicability: All.	a. Compile and maintain, consistent with 4.2.1a, a list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.	According to manufacturer EWOS all ingredients come from the 3 species above mentioned which are not categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species. EWOS parent companym Cargill has submitted its sourcing policy which -among other guidelines- requires that marine raw materials are derived from products which are not IUU, that the fish species and country of fishing area is registered and that the fish species is not listed in the IUCN Red Data list for the current year. All marine materials will come from fisheries adhering to FAO's "Code of Conduct for Responsible Fisheries" and by 2025 all material will be produced according to IFFO RS and MSC standards, covering quality and environmental sustainability respectively. Según el fabricante EWOS, todos los ingredientes provienen de las 3 especies mencionadas anteriormente que no están clasificadas como vulnerables, en peligro o en peligro crítico, según la Lista Roja de Especies Amenazadas de la UICN. La empresa matriz de EWOS, Cargill, presentó su		
4.3.3		b. Obtain a declaration from the feed producer and/or supplier stating that no fishmeal or fish oil originating from fish species which are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species is used to produce feed.		Compliant	
		c. If meal or oil originated from a species listed as "vulnerable" by IUCN but that species is sourced from a local stock that is not considered vulnerable, obtain documentary evidence to support a request for an exception based on regional differences in status of the relevant species/populations.	política de abastecimiento que, entre otras pautas, requiere que las materias primas marinas se deriven de productos que no sean INDNR, que las especies de peces y el país de la zona de pesca estén registrados y que las especies de peces no estén incluidas en la Lista Roja de Datos de la UICN para el año en curso. Todos los materiales marinos provendrán de las pesquerías que se adhieren al "Código de conducta para la pesca responsable" de la FAO y, para 2025, todos los materiales se producirán de acuerdo con las normas IFFO RS y MSC, que abarcarán la calidad y la sostenibilidad ambiental, respectivamente.		
		d. Others, please describe			



4.3.4	Feed ingredients which come from other fish from the same genus. Requirement: None. Applicability: All.	a. Obtain from feed producers and/or suppliers declarations that the fishmeal and/or fish oil does not originate from fish of the same genus as that under cultivation. b. Obtain documentary evidence that feed manufacturer operates procedures to ensure that no raw material in a diet originates from the same genus as the fish for which the diet is intended. This includes all fishmeal and fish oil (including bulk fish and waste/trimmings/byproduct) that may be used. c. Others, please describe	OBSERVATION: no explicit declaration from feed supplier that ingredients do not come from the same genus, but supplier has provided list of raw materials and source fisheries. OBSERVACIÓN: no hay una declaración explícita del proveedor de alimentos de que los ingredientes no provienen del mismo género, pero el proveedor ha proporcionado una lista de materias primas y pesquerías de origen.	Compliant	
		Crit	terion 4.4 Responsible origin of non-marine raw materials in feed		
		a. Maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records.	Declaration from Cargill Aqua Nutrition group (CQN) (EWOS owner) states that CQN will source all of its soy products from responsible supply chains audited to standards successfully benchmarked against the FEFAC Soy Sourcing Guidelines. CQN will source all of its oil palm products from responsible supply chains audited to standards such as RSPO or equivalent. CQN will only use materials which are deemed fit for purpose by the national law and demands of our own facilities. We will also use those materials we judge to be		
4.4.1	traceability and a responsible sourcing policy for the feed manufacturer for feed ingredients which comply with internationally recognized moratoriums and local laws. Requirement: Yes.	b. Inform each feed producer (and supplier) in writing of ASC requirements pertaining to traceability and responsible sourcing for feed manufacturers and/or suppliers.	responsibly produced based on the best information available to us. CQN is committed to supporting Cargill's signing of the "New York Declaration on Forests": we will strive to achieve zero deforestation in our supply chain by 2030, having halved it by 2020. La declaración del Grupo Cargill Aqua Nutrition (CQN) (propietario de EWOS) establece que CQN obtendrá todos sus productos de soya de cadenas de suministro responsables auditadas según estándares exitosamente comparados con las Pautas de FEFAC para la obtención de soja. CQN adquirirá todos sus productos de palma aceitera de cadenas de suministro responsables auditadas según estándares como RSPO o equivalente. CQN solo utilizará materiales que se consideren aptos para el propósito según la legislación nacional y las demandas de nuestras propias instalaciones. También utilizaremos los materiales que consideremos que se producen de manera responsable en función de la mejor información disponible para nosotros. CQN se compromete a respaldar la firma de Cargill de la "Declaración de Nueva York sobre los Bosques": nos esforzaremos por lograr una deforestación cero en nuestra cadena de suministro para el año 2030, habiéndolo reducido a la mitad para el año 2020.	Compliant	
	Applicability: All.	c. For each feed producer used by the farm, confirm that an independent third party audit of the producer was recently completed by a CAB against a standard that includes an evaluation of feed input traceability. Obtain a copy of the most recent audit report for each feed producer. d. Others, please describe			
4.4.2	transgenic plant raw material, or raw materials derived from genetically modified plants, in the feed.	a. Obtain from feed supplier(s) a declaration detailing the content of transgenic plant raw materials and/or raw materials derived from genetically modified plants, in feed. This requirement is just about knowing that the feed includes or does not include transgenic material and then not claim the opposite. b. Disclose to the buyer(s) a list of any transgenic and /or genetically modified plant raw material used in feeds and	Con la excepción de la harina de gluten de maíz (CGM), EWOS Canada Ltd no utiliza materias primas transgénicas ni materias primas derivadas de material transgénico, ni materia prima derivada de plantas transgénicas en ninguno de sus productos alimenticios. La harina de gluten de maíz que se puede usar en el alimento puede provenir parcialmente de cultivos de maíz transgénico. With the exception of corn gluten meal (CGM), no transgenic raw materials or raw materials derived from transgenic material, or raw material derived from transgenic plants is used by EWOS Canada Ltd in any of its feed products. The corn gluten meal which can be used in the feed may be partially sourced from transgenic corn crops.	Compliant	



4.4.3	Requirement: 80% for soy and palm oil within 5 years from the date of the publication of the ASC Seriola and Cobia Standard. Applicability: All.	a. Obtain documentation that indicates the relative quantities of non-marine ingredients used in feed manufacture that is certified under an ISEAL member's accredited certification. b. For non-conforming farms, prepare a declaration stating the farm's intent to source feed that contains non-marine ingredients certified under an ISEAL member standard that addresses both environmental and social sustainability. c. If audit >5 years after publication of Seriola and Cobia standards, provide documentation that confirms that requirement for at least 80% of non-marine ingredients used in feed comes from ISEAL member certifications that address both environmental and social sustainability. d. Others, please describe PRINCIPLE 5: PROACTIVELY MAINTAIN T	No se aplica hasta 2021, pero hay una Declaración del Grupo Cargill Aqua Nutrition (CQN) (propietario de EWOS) que establece que CQN obtendrá todos sus productos de soya de cadenas de suministro responsables auditadas de acuerdo con las normas de referencia exitosas de acuerdo con las Pautas de FEFAC para la obtención de soja. CQN adquirirá todos sus productos de palma aceitera de cadenas de suministro responsables auditadas según estándares como RSPO o equivalente. Not applicable until 2021 but there is a Declaration from Cargill Aqua Nutrition group (CQN) (EWOS owner) states that CQN will source all of its soy products from responsible supply chains audited to standards successfully benchmarked against the FEFAC Soy Sourcing Guidelines. CQN will source all of its oil palm products from responsible supply chains audited to standards such as RSPO or equivalent.	Compliant	
	T	T T T T T T T T T T T T T T T T T T T	Criterion 5.1 Transfer of pests or parasites to wild stocks		
5.1.1	Commitment to participate in an Area-Based Management (ABM) scheme. Requirement: The farm participates in an ABM, where it exits, for managing disease and registance to treatments.	 a. Keep record of farm's participation in an ABM scheme and communication around scheme availability. b. Submit to SCS a description of how the ABM coordinates management of disease and resistance to treatments, for instance: - coordination of stocking; - fallowing; - therapeutic treatments; and - information sharing. c. Provide SCS access to documentation which is sufficient for the auditor to evaluate the ABM's compliance with definition of area, minimum % participation in the scheme, components, and coordination requirements. d. Others, please describe 	There is no ABM; but there have been initial conversations with the only other Seriola farm in area. No hay ABM; pero ha habido conversaciones iniciales con la única otra granja de Seriola en el área.	Compliant	
5.1.2	A demonstrated commitment to collaborate with NGOs, academics and governments on areas of mutually agreed research to measure possible impacts of pests or parasites on wild stocks. Requirement: Yes.	a. Retain records to show how the farm and/or its operating company has communicated with external groups (NGOs, academics, governments) to agree on and collaborate towards areas of research to measure impacts on wild stocks, including records of requests for research support and collaboration and responses to those requests. b. Provide non-financial support to research activities in 5.1.2a by either: - providing researchers with access to farm-level data; - granting researchers direct access to farm sites; or - facilitating research activities in some equivalent way. c. When the farm and/or its operating company denies a request to collaborate on a research project, ensure that there is a written justification for rejecting the proposal. d. Maintain records from research collaborations (e.g. communications with researchers) to show that the farm has supported the research activities identified in 5.1.2a. e. Others, please describe	Kampachi King participa en varios proyectos de investigacion con centros educativos e instituciones publicas, incluyendo a CIBNOR y UABCS. Durante la auditoria se revisaron proyectos y se explico el alcance de las investigaciones. Los proyectos incluyen ACUSE KAMPACHI, Proyecto	Compliant	



5.1.3	On-farm testing for ectoparasites, with test results made easily publicly available. Requirement: Yes, with results made easily publicly available within seven days of testing. Applicability: All.	a. Prepare an annual schedule for ectoparasite testing that identifies timeframes of routine testing frequency. b. Maintain records of results of on-farm testing for ectoparasites. If farm deviates from schedule due to weather maintain documentation of event and rationale. c. Document the methodology used for testing ectoparasite s ('testing' includes both counting and identifying ectoparasites). The method must follow national or international norms, follows accepted minimum sample size, use random sampling, and record the species and life stage of the ectoparasite. If farm uses a closed production system and would like to use an alternate method (i.e. video), farm shall provide SCS with details on the method and efficacy of the method. d. Make the testing results from easily publicly available (e.g. posted to the company's website) within seven days of testing. If requested, provide stakeholders access to hardcopies of test results. e. Keep records of when and where test results were made public. f. Submit test results to ASC at least once per year. g. Others, please describe	Se realizaron pruebas de ectoparásitos y se presentaron los resultados de las pruebas semanales desde agosto de 2018. Las pruebas se realizan de acuerdo con la metodología del Procedimiento para el muestreo de ectoparásitos. Los resultados no se hacen públicos. Testing for ectoparaites is done and results for weekly testing since August 2018 were presented. Testing is done according to methodology in <i>Procedure for sampling of ectoparasites</i> . Results are not made public. Criterion 5.2 Chemicals and treatments	Minor	Testing for ectoparasites is done but results are not made public. Finding is graded Minor as client shows partial conformance. Se hace muestreo de ectoparasitos, pero los resultados no se han hecho publicos.	
		a. Maintain a current version of the WHO list of	Citetion St.2 Chemicals and dedunents			
5.2.1	Use of therapeutic treatments that are banned by law under the local jurisdiction or listed as critically important for human medicine by the World Health Organization. Requirement: Not permitted. Applicability: All.	c. If the farm has used antibiotics listed as critically important to human health and/or has used therapeutants that are banned in finfish culture to treat any fish during the current production cycle, inform SCS prior to scheduling audit. d. If yes to 5.2.1c, request an exemption to the requirement of 5.2.1 from SCS in order to certify only that portion of production that complies with the indicator. Prior to the audit, provide SCS with records sufficient to establish details of treatment, which holding facilities were treated, and how the farm will ensure full traceability and separation of treated fish through and post- harvest. e. Others, please describe	La finca no usa medicamentos prohibidos por la ley o en la lista de OMS de antibioticos de importancia Critica para la salud humana. No se observaron medicamentos de esta categoria durante las inspecciones de bodegas y centro de cultivo. Tambien se corroboro en entrevistas con personal. La finca tiene copia de la lista de OMS, y lista de productos permitidos para la acuicultura en Mexico. The farm does not use drugs prohibited by law or in the WHO List of Critical Importance for human health. No drugs of this category were observed during the inspections of warehouses and farm facilities. THis was also confrimed in interviews with staff. The farm has a copy of the WHO list, and list of products allowed for aquaculture in Mexico.	Compliant		
5.2.2	antimicrobial treatments (excluding prebiotics or vaccinations). Requirement: Not permitted. Applicability: All.	a. Maintain records for all purchases of chemical antimicrobials (invoices, prescriptions) for the current and prior production cycles. b. Maintain a detailed log of all medication-related events (see also 5.2.1a and 5.2.3). c. Calculate the total amount (g) and treatments (#) of chemical antimicrobials used during the current and preceding production cycles. d. Others, please describe	No se han usado productos antimicrobianos. King Kampachi tiene florfenicol en stock pero no se ha usado. No antimicrobial products have been used. King Kampachi has florfenicol in stock but has not been used.	Compliant		



5.2.3	Farms have a comprehensive fish health management plan approved by the farm's designated veterinarian that includes either a) vaccination against diseases that present a risk in the region and for which an effective and commercially viable vaccine exists, or b) veterinarian-approved alternative fish health management strategies. Requirement: Yes.	a. Prepare a fish health management plan that incorporates components related to identification and monitoring of fish disease and parasites. This plan may be part of a more comprehensive farm planning document. b. Ensure that documentation is available to verify that the fish health management plan includes mandatory procedures for either: i) vaccination against diseases that present a risk in the region and for which an effective and commercially viable vaccine exists; OR ii) veterinarian-approved alternative fish health management strategies c. Ensure that the farm's current fish health management plan was reviewed and approved by the farm's designated veterinarian. d. Demonstrate that the farm complies with World Organisation for Animal Health (OIE) regulations relating to transfer of fish/eggs/fingerlings, Specific pathogen free status and quarantine status (see http://www.oie.int/international-standard-setting/aquatic-code/access-online/). e. Others, please describe	La granja King Kampachi tiene un plan integral de gestión de la salud de los peces basado en el plan de gestión FHMP de Kona Blue (Hawaii); no se utilizan vacunas, FHMP cumple con las directrices de la OIE. Guadalupe Bacenas es la veterinaria en funciones, recientemente contratada. Ella está revisando el FHMP que se ha utilizado antes de su empleo. El veterinario no había aprobado el FHMP en el momento de la auditoría. King Kampachi farm has a comprehensive fish health management plan based on Kona Blue (Hawaii) FHMP management plan; no vaccines are used, FHMP complies with OIE guidelines. Guadalupe Bacenas is the acting veterinarian, recently hired. She's revising the FHMP that has been used prior to her employment. The FHMP had not been approved by the veterinarian at the	Minor	FHMP has not been finalized or approved by veterinarian. Finding graded as Minor as client has shown partial conpliance. El Plan de salud de peces no ha sido aprobado por un veterinario.	
5.2.4	Allowable farm level antiparasiticide treatment not including freshwater, formaldehyde or hydrogen peroxide. Requirement: None. Applicability: All.	a. Identify permitted anti-parasiticides that may be applied to stock during the farming procedure in the fish health management plan. Provide Material Data Safety Sheets for all anti-parasiticide products that are used. Only freshwater, formaldehyde and hydrogen peroxide is allowed and others are banned. b. Make available records relating to all chemical, veterinary and therapeutant suppliers. Include Invoices, laboratory testing results as well as prescriptions and treatment records.	praziquantel y las perspectivas para la salud humana. Los artículos indican que el praziquantel no es perjudicial para la vida marina debido a la degradación y la forma en que se administra a los peces (en los piensos). Investigaciones futuras pueden confirmar o negar este supuesto. An antihelmintic: Praziquantel has been used for 2 treatments (11 Oct 2018 and 26 Sept 2018). This product has not been shown to be detrimental to the environment and marine or aquatic life.	Compliant	OBSERVATION: While the standard does allow exception for benign treatment, continuing burden of proof is upon Kampachi Mexico to demontrate that any uses of praziquantel have no deleterious impacts on surrounding environment or species.	
		c. Others, please describe				
		a. Monitor and record on-farm percent saturation of DO at	Criterion 5.3 Environmental welfare			
5.3.1	Weekly average percent dissolved oxygen (DO) saturation on farm, calculated in the following methodology. Requirement: >70% saturation. Applicability: All farms. Exception can be granted to farms that do not conform to >70% saturation where it can be demonstrated that farm site DO readings are consistent with those of a reference site.	a minimum of twice daily using a calibrated oxygen meter or equivalent method. For first audits, farm records must cover ≥ 6 months. The ASC recognizes that it is not always safe to carry out weekly monitoring and there can be pragmatic and sensible solutions to testing. Under no circumstances should worker safety be compromised if, for example, there is bad weather. b. Provide a written justification for any missed samples or deviations in sampling time. c. Calculate weekly average percent saturation based on data. d. If any weekly average DO values are < 70%, or approaching that level, monitor and record DO at a reference site and compare to on-farm levels (see Instructions). e. Arrange for auditor to witness DO monitoring and calibration while on site. f. Others, please describe	Se presentaron registro de oxigeno disuelto desde julio 2018. No hubo promedios semanales de OD inferiores a 70% de saturacion. Se observo uso y calibracion de equipo de monitoreo de oxigeno disuelto. Dissolved oxygen records were presented from July 2018 to the time of the audit. There were no weekly DO averages when DO concentrations were lower than 70% saturation. The use and calibration of dissolved oxygen monitoring equipment was observed.	Compliant		>70%



5.3.2	Requirement: <5%. Applicability: All farms. Exception can be granted to farms that do not conform to >70% saturation where it can be demonstrated that farm site DO readings are consistent with those of a	a. Calculate the percentage of on-farm samples taken that are less than 70% saturation DO. b. Inform SCS if the percentage of on-farm DO measurements that are less than 70% DO is greater than 5%. Provide data for previous 6 months. c. Others, please describe	CIPLE 6: OPERATE FARMS WITH RESPONSIBLE LABOR PRACTICES	N/A	No hubo promedios semanales de OD inferiores a 70% de saturacion. There were no weekly DO averages lower than 70% saturation.
		FRIN	Criterion 6.1 Child labor) and young workers		
6.1.1	Number of incidences of child labor. Requirement: None.	 a. In most countries, the law states that minimum age for employment is 15 years. There are two possible exceptions: in developing countries where the legal minimum age may be set to 14 years; or in countries where the legal minimum age is set higher than 15 years, in which case the legal minimum age of the country is followed. If the farm operates in a country where the legal minimum ages is not 15, then the employer shall maintain documentation attesting to this fact. b. Minimum age of permanent workers is 15 or older 	La Ley Federal de I Trabajo Articulo 175 Prohíbe la utilización del trabajo de los menores de dieciocho años en labores peligrosa dentro de las cuales se incluye labores de pesca (8). Basado en la revisión de documentos, entrevistas a personal administrativo y trabajadores de la empresa. No existen incidentes o historia de contratación de menores de 18 años de edad. The Federal Labor Law Article 175 prohibits the use of work by children under eighteen years of age in hazardous work, which includes fishing activities (8). Based on the document review, interviews with administrative staff and company workers. There	Compliant	
		(except in countries as noted at 6.1.1a). c. Employer must maintain personnel records that are sufficient to demonstrate conformity with requirements. d. Others, please describe	are no incidents or hiring history of children under 18 years of age.		
6.1.2	Percentage of young workers that are protected. Requirement: 100%. Applicability: All.	a. Young workers are appropriately identified in company policies & training programs, and job descriptions are available for all young workers at the site. b. All young workers (from age 15 to less than 18) are identified and their ages are confirmed with copies of IDs. c. Daily records of working hours (i.e. timesheets) are available for all young workers. d. For young workers, the combined daily transportation time and school time and work time does not exceed 10 e. Young workers are not exposed to hazards and do not perform hazardous work. Work on floating cages in poor weather conditions shall be considered hazardous. f. Others, please describe	Basado en la revisión de documentos, entrevistas a personal administrativo y trabajadores de la empresa. No existen incidentes o historia de contratación de menores de 18 años de edad. Based on the document review, interviews with administrative staff and company workers. There are no incidents or hiring history of children under 18 years of age.	Compliant	
			Criterion 6.2 Forced , bonded or compulsory labor		
6.2.1	Number of incidents where employers withhold any part of employee salary, property, or benefits upon termination of employment. Requirement: None.	 a. It must be demonstrated that workers are free to leave the employment and workplace and that they are not subject to withholding of payments or denial of any other benefits of employment; or under any other obligations to the employer other than those are legal and contractual in nature. b. Conformity will be verified further through discussion with selected staff members during the on-site audit. 	Basado en la revisión de registros de nomina, por periodos seleccionados al azar y posiciones de trabajo varias. además de entrevistas a trabajadores. La empresa no retiene ninguna parte del salario, propiedad o beneficios de los trabajadores. Based on the review of payroll records, by randomly selected periods and various work positions, based on worker interviews. The company does not retain any part of the workers' salary, property or benefits.	Compliant	
	,,	c. Others, please describe			



6.2.2	employees are required to surrender original identity documents upon commencing employment (except as required for processing of legal documentation).	a. It must be demonstrated that workers are not required to surrender original identity documents except for when and for as long as it is necessary for the purpose of processing legal documentation. b. Conformity will be verified further through discussion with selected staff members during the on-site audit. c. Others, please describe		Compliant	
		a. Demonstrate that employer has a written pro-active anti- discrimination policy in place, stating the company does			
6.3.1	Evidence of comprehensive and pro-active antidiscrimination policies, procedures and practices including, but not limited to, discrimination in the workplace and equal access to all jobs in relation to gender, age, race, religion, creed, caste, or sexual orientation. Requirement: Yes. Applicability: All.	not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination b. Demonstrate that employer has clear and transparent company procedures that outline how to raise, file, and respond to discrimination complaints and that these policies are understood and adhered to by staff. c. Demonstrate that employer proactively respects the principle of equal pay for equal work and equal access to job opportunities, promotions and raises. d. Demonstrate that all managers and supervisors receive training on diversity and non-discrimination and pro-active tolerance of diversity. All personnel receive non-discrimination training. Internal or external training is acceptable if proven effective. e. Others, please describe		Compliant	
6.3.2	Number of confirmed incidences of discrimination. Requirement: None. Applicability: All.	a. Employer maintains a record of all discrimination complaints. Records do not show evidence that the farm discriminates on grounds related to age, gender, religion, race, creed, caste, sexual orientation, national origin, disability, union membership, political affiliation or any other condition that may give rise to discrimination. b. Interview with employees and employee testimonies will be used to confirm that the company does not interfere with the rights of personnel to observe tenets or practices, or to meet needs related to race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or any other condition that c. Others, please describe	Basado en la revisión de documentos y borrador de manual del empleado, también entrevistas a trabajadores. No existen indicadores o reportes de incidentes de discriminación. Based on document review and English version and Employee Manual draft, as well as worker interviews. There are no indicators or reports of incidents of discrimination.	Compliant	
6.3.3	Equality of pay, benefits and promotion opportunities for all employees independent of gender, age, race, religion, creed, caste or sexual orientation. Requirement: Yes. Applicability: All.	to discrimination. b. Interview with employees and employee testimonies will be used to confirm that the company does not discriminate on pay benefits or promotional opportunities on the basis.	Basado en la revisión de documentos y borrador de manual del empleado, también entrevistas a trabajadores. No existen indicadores o reportes de incidentes de discriminación en la contratacion, promocion o acceso a oportunidades en base a caracteristicas personales. Based on document review and English version and Employee Manual draft, as well as worker	Compliant	



6.3.4	Number of incidents where employer dismisses an employee on the basis of marital status or pregnancy or deny employee legal rights to pregnancy or maternity leave. Requirement: None. Applicability: All.	a. Check human resource records and employee files to verify grounds for dismissal or incidents of denying employee legal rights related to maternity or paternity leave. b. During the on-site audit, interview employees in relation to grounds for dismissal and company performance with respect to the granting of parental leave. c. Others, please describe	Basado en revisión de documentos y entrevistas a trabajadores. No se observan indicadores o reportan incidentes de despido en base a estatus legal, embarazo o licencia por embarazo. Based on review of documents and interviews with workers. No indicators are observed or reports of dismissal based on legal status, pregnancy or pregnancy leave.	Compliant	
	I	I	Criterion 6.4 Work environment health and safety		
6.4.1	Percentage of employees trained in health and safety practices, procedures and policies relevant to the job. Requirement: 100% for operations above 5 employees. Applicability: All.	risk of accident or injury. The information shall be available to employees. b. Employees know and understand emergency response procedures.	Basado en la revisión de documentos sobre Seguridad incluyendo Constancia con fecha 1/10/19 la cual indica la empresa ha iniciado proceso de verificación por parte de Protección Civil, y Proceso diagnostico por parte de Responsable de Salud y Seguridad presentando evaluación interna participativa, y lista de números de contacto de emergencia, estos son los esfuerzos documentados que provee la empresa como evidencia de su trabajo en Seguridad y salud ocupacional. Las entrevistas de los trabajadores describen que no se cuenta con protocolos o capacitaciones regulares sobre practicas de seguridad, procedimientos ni políticas hasta el momento. Sitio de engorde, existen riesgos de espacios de paso limitados en la embarcación principal sin embargo – estos ya han sido identificados en la evaluación interna participativa. Lugares observados con riesgos físicos no identificado – área de trabajo en altura de laboratorio de reproducción, no cuenta con rieles de seguridad. Based on document review including Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety procedures implemented thus far. Based on Fattening/growing site, there are risks of limited walk space in the main vessel however - these have already been identified in the participatory internal evaluation. Based on site observation of reproduction section, no hand rails/safety rails on platforms throughout the facility.	Major	No evidence provided of knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. F245. No hay evidencia de que los empleados conozcan los procedimientos, ni de capacitaciones de seguridad.
6.4.2	Protective Equipment, PPE) provided and maintained and in	 a. Employer provides workers with PPE that is appropriate to known health and safety hazards. b. Employees receive annual training in the proper use of PPE. For workers who participated in the initial training(s) previously an annual refreshment training may suffice, 	Basado en observación de áreas de trabajo y entrevista a trabajadores, áreas de reproducción y engorda. La empresa proporciona el equipo de protección personal necesario y sin costos. Based on observation of work areas and interviews with workers, hatchery, of shore site. The company provides the personal protection equipment necessary and at no cost to the employee.	Compliant	
6.4.3	All health and safety related accidents and violations are recorded and corrective actions taken when necessary. Requirement: Yes. Applicability: All.	a. Employer records all health- and safety-related accidents. b. Employer records and maintains complete documentation for all occupational health and safety events, accidents, violations and investigations. c. Employer implements corrective action plans in response to any accidents that occur. Plans are documented and they include an analysis of root cause, actions to address root cause, actions to remediate, and actions to prevent future d. Interview employees in order to determine what procedures are implemented and explain what analysis has been done and what steps were taken on foot of accidents or health and safety related events or concerns. e. Others, please describe	Basado en revisión de documentos y entrevistas a personal administrativo, y trabajadores de la empresa. No es posible confirmar que exista registro de incidentes de primeros auxilios, o incidentes de acoso y se provea seguimiento según la política de la empresa. Based document review and interviews with administrative staff and company employees. It is not possible to confirm that there is a record of first aid incidents, or incidents of harassment. No documentary evidence exists of follow-up procedures.	Major	No evidence provided of records or procedures for accidents. This finding graded Major due to its apparent systemic nature No hay evidencia de registros o procedimientos para accidentes.



6.4.4	insurance (accident or injury) for 100% of worker costs in a jobrelated accident or injury when not covered under national law. Requirement: None.	a. Employer maintains and makes available documentation to confirm that all personnel are adequately insured to cover costs related to occupational accidents or injuries (if not covered under national law). Equal insurance coverage must be provided to all workers including part-time, temporary, migrant or foreign workers. Written contract of employer responsibility to cover accident costs is acceptable evidence in place of insurance. b. Others, please describe	Los servicios de aseguranza social y salud son proporcionados por el Instituto Mexicano de Seguro Social. Basado en la revisión de documentos, pagos del seguro social y entrevistas a trabajadores, se confirma que los trabajadores conocen sus derechos y tienen acceso a los servicios del IMSS. Social insurance and health services are provided by the Mexican Social Security Institute. Based on the review of documents, social security payments and interviews with workers, it is confirmed that the workers know their rights and can access the services of the IMSS. Criterion 6.5 Wages	Compliant	
6.5.1	Percentage of workers whose basic wage (before overtime and bonuses) is below the minimum wage. Requirement: 0%. Applicability: All.	a. Employer keeps documents to show the legal minimum wage in the country of operation. If there is no legal minimum wage in the country, the employer keeps documents to show the industry-standard minimum wage. The intention of this indicator is to protect the most vulnerable workers, other staff such as managers may be paid in kind and are not to be considered as 'workers' for the purpose of this indicator. b. Employer's records (e.g. payroll) confirm that worker's wages for a standard work week (≤ 48 hours) always meet or exceed the legal minimum wage. If there is no legal minimum wage, the employer's records must show how the current wage meets or exceeds industry standard. If wages are based on piece-rate or pay-per-production, the employer's records must show how workers can reasonably attain (within regular working hours) wages that meet or exceed the legal minimum wage. c. Maintain documentary evidence (e.g. payroll, timesheets, punch cards, production records, and/or utility records). Workers will be interviewed during on-site audit to verify conformity with the above. d. Others, please describe	minimum wage of the country.	Compliant	
6.5.2	basic wage (before overtime and bonuses) is below the basic needs wage 5 years after adoption of the standard. Requirement: 0%.	 a. Auditor to calculate the basic needs wage and compare it to the farm's calculation to verify for accuracy. b. Provide evidence that all farm workers are paid at least the basic needs wage (before overtime and bonuses) within 5 years of publication of the seriola and cobia standard. c. Demonstrate basic needs wage for the country of operation. The audit team will verify accuracy of the calculation and end figure. d. Others, please describe 	No existen nuestos de contratación con salarios menores al salario mínimo del naís	Compliant	
6.5.3	Evidence of transparency in wage-setting and rendering. Requirement: Yes. Applicability: All.	 a. Wages and benefits are clearly articulated to workers and documented in contracts. b. The method for setting wages is clearly set out and explained to workers. c. Employer renders wages and benefits in a way that is convenient for the worker (e.g. cash, check, or electronic payment methods). Workers do not have to travel to collect benefits nor do they receive promissory notes, coupons or merchandise in lieu of payment. d. Workers will be interviewed to confirm conformity with the standards requirements. e. Others, please describe 	Basado en revisión de contratos de trabajadores y entrevistas. Lo trabajadores demuestran conocer y recibir la información de contratación de manera clara. El contrato lista claramente lo siguiente: Relación de Trabajo, Actividad Funciones, Lugar y Equipos de Trabajo, Duración, Salario, Jornada de Trabajo, Capacitación y Adiestramiento, Días Festivos/Días de Descanso, Sobre Vacaciones, Aguinaldo, Seguro Social, Confidencialidad mas Anexos. Based on document review workers' contracts and worker interviews. The workers show understanding of working terms and these are listed clearly on worker contracts. The contract lists the following sections: Work Relationship, Activity Functions, Work site, Working Equipment, Duration, Salary, Work Day, Training, Holidays / Rest days, Aguinaldo, Social Security, Confidentiality.	Compliant	



		Criterion 6.	6 Access to freedom of association and the right to collective baraainina			
6.6.1	organizations, and/or the ability to self-organize as well as the ability to bargain collectively or access the representative(s) chosen by workers without management interference.	a. Demonstrate that all workers have the freedom to join a trade union or any legitimate workers organisation, free of any form of interference from employers or competing organizations set up or backed by the employer. Farms shall prepare documentation to demonstrate to the auditor that domestic regulation fully meets these criteria.	En la empresa no existe representación de organización de trabajadores en la empresa, no existe Contrato de Negociación Colectiva. Basado en entrevista a trabajadores, los trabajadores confirman conocer el derecho de formar o participar en organizaciones de trabajadores o sindicatos de su elección. There is no representation of organization of workers at Kampachi, there is no collective bargaining agreement. Based on worker interviews, workers show understanding of their right to form or participate in workers' organizations or unions of their choice.	Compliant		
6.6.2	discriminated against.	members of unions or workers organizations being discriminated against by management b. Review any stated cases of discrimination on the basis of union membership or membership of workers organisations with management to verify whether the farm is in conformity with requirements of the standard c. Others, please describe	Basado en revisión de documentos y entrevistas a trabajadores no se observan indicadores de riesgo o reportan incidentes de discriminación por participar en organizaciones de trabajadores. Based on document reviews and worker interviews, no indicators of risk are observed or incidents of discrimination are reported for participating in workers' organizations.	Compliant		
		Criterion 6.7 Harassment and disciplinary	y practices in the working environment causing temporary or permanent physical and/or mental harm			
6.7.1	Incidences of excessive or abusive disciplinary actions. Requirement: None. Applicability: All.	a. Verify that the employer does not use threatening, humiliating or punishing disciplinary practices that negatively impact a worker's physical and mental health or dignity. b. Allegations of corporal punishment, mental abuse, physical coercion, or verbal abuse must be fully documented in a company procedure so that these can be c. During on-site audit, workers will be interviewed to determine whether there is evidence of excessive or abusive d. Others, please describe	Basado en revisión de documentos y entrevistas a trabajadores. Revisión de documentos incluye acción disciplinaria y despidos. No se observan indicadores de riesgo o reportan incidentes de aplicación de acción disciplinaria abusiva o excesiva. Based on document reviews and worker interviews. Document review; disciplinary action and layoffs. No indicators of risk are observed or reported of incidents of abusive or excessive disciplinary action.	Compliant		
6.7.2	documented and communicated to employees.	a. Employer has written policy for disciplinary action which explicitly states that its aim is to improve the worker. Maintain evidence that employees are aware of procedures and that the process is transparent. b. Maintain documentary audit trail for incidences of disciplinary action and outcome (incl. worker evaluation reports). Workers may be interviewed during onsite audit to determine level of conformity and that disciplinary action c. Others, please describe	Basado en revisión de documentos y entrevistas a trabajadores. Revisión de documentos incluye acción disciplinaria y despidos. No se observan indicadores de riesgo o reportan incidentes de aplicación de acción disciplinaria abusiva o excesiva. Based on document reviews and worker interviews. Document review; disciplinary action and layoffs. No indicators of risk are observed or reported of incidents of abusive or excessive disciplinary action.	Compliant		
6.7.3	Evidence that incidences of harassment are recorded and addressed with corrective actions. Requirement: 100%. Applicability: All.	and records details, action taken, outcome and corrective actions required. b. During the on-site audit, interview workers with respect	Basado en revisión de documentos y entrevistas a personal administrativo, y trabajadores de la empresa. No es posible confirmar que exista registro de incidentes de primeros auxilios, o incidentes de acoso y se provea seguimiento según la política de la empresa. Based document review and interviews with administrative staff and company employees. It is not possible to confirm that there is a record of first aid incidents, or incidents of harassment. No documentary evidence exists of follow-up procedures.	Major	No evidence provided of records or procedures for harassment cases. F308 No hay evidencia de registros o procedimientos para casos de acoso.	



	Criterion 6.8 Working hours and overtime										
6.8.1	Incidences, violations or abuse of working hours or overtime laws. Requirement: None. Applicability: All.	b. Examination of a randomly selected sample of records (by the auditor) - including time sheets and payroll records show that farm workers do not exceed the number of working hours allowed under the law. c. If an employer requires employees to work shifts at the farm (e.g. 10 days on and six days off), the employer compensates workers with an equivalent time off in the calendar month and there is evidence that employees have agreed to this schedule (e.g. in the hiring contract) d. Farm workers may be interviewed be interviewed to confirm there is no abuse of working hours and overtime laws. e. Others, please describe	Basado en revisión de documentos y entrevistas a trabajadores. La empresa no mantiene en el momento un registro preciso de hora de entrada y salida de los trabajadores, se mantiene un horario de trabajo. Las entrevistas a trabajadores confirman que existe un horario de trabajo, y para los trabajadores del bote un horario de 6 días de trabajo y 6 días de descanso. La legislación Mexicana permite un horario regular de 48 horas semanales, y horas extras 9 horas extras las cuales llevan un pago de hora doble a la hora regular, sin embargo la legislación permite horas extras adicionales las cuales deben ser pagas como horas triples y de esta manera excede la recomendación internacional. Basado en entrevistas a trabajadores , los trabajadores confirman conocimiento del carácter voluntario de horas extras y no se reporta abuso de horas extras. Based on document review. The company does not maintain a precise record of the time of entry and exit of workers, it maintains a work schedule. Worker interviews confirm the schedule, as well as workers working on the boat which describe there is a schedule of 6 working days and 6 rest days. Mexican legislation allows a regular schedule of 48 hours per week, and overtime: 9 extra hours paid double the regular hour and additional overtime hours which must be paid triple the regular hour, exceeding the internationally accepted recommendations. Based on interviews with workers, workers confirm knowledge of the voluntary character of overtime and no overtime abuse is reported.	Compliant							
6.8.2	Overtime is limited, voluntary, paid at a premium rate and restricted to exceptional circumstances. Requirement: Yes. Applicability: All farms unless exempted.	a. Make available payment records (e.g. pay advice) show that workers are paid a premium rate for overtime hours. b. Overtime is limited and occurs in exceptional circumstances. b. Overtime is limited and occurs in exceptional circumstances as evidenced by farm records (e.g. production records, time sheets, and other records of working hours. c. Workers may be interviewed to confirm that all overtime is voluntary (unless there is a collective bargaining.		Compliant							
			riterion 6.9 Contracts or other written employment agreements								
6.9.1	Percentage of workers who have contracts or other written employment agreements. Requirement: 100%. Applicability: All.	 a. The employer maintains a record of all employment contracts. b. There is no evidence for labor-only contracting relationships or false apprenticeship schemes. c. Be advised that workers will be interviewed to confirm the above. d. Others, please describe 	Basado en revision de documentos. Todos los trabajadores cuentan con contratos con la empresa Based on document review. All workers have contracts with the company	Compliant							



6.9.2	Evidence of a policy to ensure social compliance of its suppliers and contractors when operating on the farm site. Requirement: Yes. Applicability: All.	 a. Farm has a policy to ensure that all companies contracted to provide supplies or services (e.g. divers, cleaning, maintenance) have socially responsible employment practices and policies. b. Producing company has criteria for evaluating its suppliers and contractors. The company keeps a list of approved suppliers and contractors. c. Producing company keeps records of communications with suppliers and subcontractors that relate to compliance with 6.7.2. d. All workers on site including those indirectly employed are to be protected by the requirements of Principle 6 and the auditor can check records, observations and interviews with these workers to evaluate compliance. e. Others, please describe 	policy in place to ensure social compliances of its subcontractors.	Major	No evidence of a policy in place to ensure social compliances of its suppliers and contractors when contracted to operate on the farm site. This finding graded Major due to its apparent systemic nature. No es posible evidenciar una política para garantizar el cumplimiento social de sus proveedores y contratistas cuando se contrata para operar en el sitio de la granja.
			Criterion 6.10 Conflict resolution		
	Evidence of worker access to effective, fair and confidential grievance procedures. Requirement: Yes. Applicability: All. for griedon. b. Yes.	 a. The employer has a clear labor conflict resolution policy for the presentation, treatment, and resolution of worker grievances in a confidential manner, supported by a documented procedure. b. Workers are familiar with the company's labor conflict resolution policies and procedures. There is evidence that 	Basado en revisión de documentos, incluyendo "Employee Manual" el cual se encuentra en Ingles (y por ende no accesible a personal local) y esta basado en la empresa hermana de Kampachi México localizada en Estados Unidos. En el momento no existe una política sobre procedimiento de agravio/queja, o una política sobre resolución de conflicto. Sin embargo hágase notar que a partir de entrevistas a trabajadores, quienes describen líneas de comunicación accesibles y directas con sus supervisores no se reportan quejas, o indicadores de falta de acceso de		There is no policy or grievance procedures available for workers.
6.10.1		workers have access to fair treatment of complaints. c. The farm must maintain documentary evidence (e.g.	comunicación. Based on document review, including "Employee Manual" which is in English (therefore not accessible to local employees) and is based on the sister company of Kampachi Mexico located in the United States. At the moment there is no policy on grievance procedure / complaint, or a policy on conflict resolution. However, it should be noted that from interviews with workers, who describe accessible and direct communication lines with their supervisors, no complaints are reported, or indicators of lack of communication.	Major	No hay procedimientos de quejas o políticas disponibles para los trabajadores.
6.10.2	Percentage of grievances handled that are addressed within a 90-day timeframe. Requirement: 100%. Applicability: All.	a. The employer maintains a record of all grievances, complaints and labor conflicts that are raised. b. The employer keeps a documentary record of follow-up and outcome, according to procedural requirements (including corrective actions) and timeframe in which c. Workers will be interviewed to verify conformity with the procedure for dealing with grievances and that they were addressed within a 90-day timeframe. d. Others, please describe	reported or documented complaints.	Compliant	
			on 6.11 Living conditions for employees accommodated on the farm		
6.11.1	Farm employees have access to clean, sanitary, safe and suitable living conditions. Requirement: Yes. Applicability: All.	 a. Provide evidence that potable/safe drinking water is always available for workers b. Provide evidence that adequate sanitary facilities are available for workers c. Provide evidence of safe, secure and quality accommodation sufficient to withstand local conditions in the event of storms or other natural events that could endanger lives. d. Provide evidence that accommodation provided is suitable to workers needs (and their family's), appropriate for their gender if accommodated on site also. d. Others, please describe 	Basado en la observación de sitios de trabajo en un total de tres incluyendo cria, engorda, nave y vivienda. Los trabajadores tienen acceso a condiciones sanitarias de trabajo y vivienda. Based on site observation, all 3 operations sites, working and living conditions are sanitary and adequate.	Compliant	



6.11.2	couples are working and accommodated together. Requirement: Yes. Applicability: All farms and accommodation and worksites except as permitted exclusions	exception of married couples being accommodated together and at worksites that have less than 10 employees. b. Others, please describe	En los sitios de trabajo si existen facilidades sanitarias correspondiente a genero por separado. Based on site observation, worksites are confirmed to have access to sanitary facilities, corresponding/separate for males and females. E 7: BE A GOOD NEIGHBOR AND CONSCIENTIOUS CITIZEN PRACTICES	Compliant		
		PRINCIPLI	Criterion 7.1 Community engagement			
7.1.1	Evidence of regular and meaningful consultation and engagement with community representatives and organizations. Requirement: Yes. Applicability: All.	d. Consultations include communication about, or discussion of, the potential human health risks of therapeutic treatments. The intention is for the farm to resolve conflicts that the farm has control / responsibility	No existe evidencia de capacitación a la comunidad sobre entrenamiento sobre materiales de control utilizados para peces y posibles riesgos en la salud humana. Hágase notar que Kampachi México colabora de manera formal y regular con Instituciones gubernamentales y Educativas, sus sitios de reproducción y hatchery se localizan en instalaciones de CIBNOR y UNABCS, y de esta manera se evidencia comunicación abierta y constante con partes interesadas. There is no evidence of training to the community on training on control materials used for fish and possible risks to human health. Please note that Kampachi Mexico collaborates formally and regularly with governmental and educational institutions, its breeding sites and hatchery are located in CIBNOR and UNABCS facilities, and in this way there is evidence of open and constant communication with stakeholders.	Minor	There is no evi+F314dence of cooperation with the community and other stakeholders. This finding graded Minor as client has shown conformance up to a point. No hay evidencia de cooperación con la comunidad y otras partes interesadas.	
7.1.2	Presence and evidence of an effective policy and mechanism for the presentation, treatment and resolution of complaints by community stakeholders and organizations. Requirement: Yes. Applicability: All.	c. The farm's mechanism for handling complaints is	No se evidencian informes o registros escritos de queja o sugerencia identificadas por parte de la comunidad . No existe un sistema o procedimiento para esta función. There are no reports or written records of complaints or suggestions identified by the community. There is no system or procedure for this function.	Major	There is no system or procedure for community grievances. This finding graded Major due to its apparent systemic nature. No existe un sistema o procedimiento para quejas de la comunidad.	



		Ci	riterion 7.2 Respect for local cultures and traditional territories		
	Local groups consulted during project design and operation.	the process compiles than 712.25	Basado en la observación del sitio y entrevista a participantes de la comunidad, no existen grupos indígenas identificados en el área de operaciones.		
7.2.1	Requirement: At least 2x per year or as required by relevant local and/or national laws and regulations. Applicability: All.	 b. Farm management demonstrates an understanding of relevant local and/or national laws and regulations that pertain to consultations with indigenous groups. c. Representatives from the local community, including complainants where applicable, may be interviewed to confirm the above consultation and engagement with local groups at planning and operational stages. d. Others, please describe 	No se presentan registros de quejas de la comunidad. Based on the observation of the site and interview of community participants, there are no indigenous groups identified in the area of operations. No records of community complaints are presented.	Compliant	
			Criterion 7.3 Access to resources		
7.3.1	Requirement: 0.	l	Based on the observation of the site, and stakeholder meeting. The company does not obstruct		
	Applicability: All.	restricted access to vital resources without prior community approval. d. Others, please describe			
	Assessments of company's impact on access to resources.	a. There is a documented assessment of the farm's impact upon access to resources. Can be completed as part of community consultations under 7.2.1.	The Environmental Impact Declaration evaluates all impacts extensively, including social and economic impacts, and concludes that In general, in this component, the impact identified is positive and affects mainly productive activities, quality of life and employment. This impact is positive, local and mild.		
7.3.2	Requirement: At least once per year. Applicability: All.	presented in 7.3.2a.		Compliant	
		c. Others, please describe			

NC Ref	Clause	Grade of NC	Description of NC	Evidence	Date of detection	Status	Root cause (by client)	Corrective/ preventive actions proposed by UoC and accepted by CAB	Deadline for NC close-out	Evaluation by SCS (including evidence)	Aquacult vards Actual date of ncil close-out
19-01	3.3.2		been made publicly available. This finding graded Minor as client has	Kampachi ha tenido pequenos escapes por dano de red de nylon, el mayor escape reportado se calcula en 1 500 peces. La adminsitracion tiene conocimeintos de co k relizar lo calculos de perdidas y mortalidades y todos los parametros de poblacion en general, ademas tiene bitacora y registro para escapes y registros semanales de biomasa, individuos, peso, etc., pero la informacion de escapes no se ha divulgado al publico. Kampachi has had small escapes due to nylon net damage, the largest reported loss is estimated at 1 500 fish. The management has knowledge of how to perform loss and mortality calculations, and all the population parameters in general; besides it has a logbook for escapes and weekly records of biomass, individuals, weight, etc., but the information of escapes has not been made public.	February 1, 2019	Open	Kampachi intended to publish this information in our Annual ESG Report, the first of which is pending (anticipated publication date early March 2019)	ESG Report will be published in March 2019.	May 1, 2019		
19-02	4.3.4		OBSERVATION: no explicit declaration from feed supplier that ingredients do not come from the same genus, but supplier has provided list of raw materials and source fisheries. OBSERVACIÓN: no hay una declaración explícita del proveedor de alimentos de que los ingredientes no provienen del mismo género, pero el proveedor ha proporcionado una lista de materias primas y pesquerías de origen.		February 1, 2019	Open	Kampachi misunderstood this requirement (species are listed, but no explicit declaration), but feed supplier would readily provide this declaration.	Request declaration from feed supplier.	1st Surveillance		

										Agu
19-03	5.1.3	Minor	done but results are not made public. Finding is graded Minor as client shows partial conformance. Se hace muestreo de ectoparasitos, pero los resultados no se han hecho publicos.	Se realizaron pruebas de ectoparásitos y se presentaron los resultados de las pruebas semanales desde agosto de 2018. Las pruebas se realizan de acuerdo con la metodología del Procedimiento para el muestreo de ectoparásitos. Los resultados no se hacen públicos. Testing for ectoparaites is done and results for weekly testing since August 2018 were presented. Testing is done according to methodology in Procedure for sampling of ectoparasites. Results are not made public.	February 1, 2019	Open	Kampachi intended to publish this information in our Annual ESG Report.	Kampachi will establish a reporting procedure on our website, and will post skin fluke monitoring counts every Monday. N.B. The requirement is for "within seven days of testing", but sometimes it takes the research team several days to complete counts. A sample collected offshore on Friday will be delivered on Monday, and then counted by Tuesday or Wednesday. This will then mean that some counts are only published 10 days or so after the sample was collected, but it will be within 7 days of the count completion. Is this acceptable?	May 1, 2019	
19-04	5.2.3	Minor	finalized or approved by veterinarian. Finding graded as Minor as client has shown partial conpliance. El Plan de salud de peces no ha sido aprobado por un veterinario.	La granja King Kampachi tiene un plan integral de gestión de la salud de los peces basado en el plan de gestión FHMP de Kona Blue (Hawaii); no se utilizan vacunas, FHMP cumple con las directrices de la OIE. Guadalupe Bacenas es la veterinaria en funciones, recientemente contratada. Ella está revisando el FHMP que se ha utilizado antes de su empleo. El veterinario no había aprobado el FHMP en el momento de la auditoría. King Kampachi farm has a comprehensive fish health management plan based on Kona Blue (Hawaii) FHMP management plan; no vaccines are used, FHMP complies with OIE guidelines. Guadalupe Bacenas is the acting veterinarian, recently hired. She's revising the FHMP that has been used prior to her employment. The FHMP had not been approved by the veterinarian at the time of the audit.	February 1, 2019	Open	Kampachi had only recently appointed the company veterinarian, and the FHMP is under her review.	The FHMP will be completed and signed by the company veterinarian by March 1st.	May 1, 2019	

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19-05	5.2.4	Compliant	OBSERVATION: While the		February 1, 2019	Open	Kampachi understood, from previous	A Memo providing evidence of the "benign"	1st Surveillance			vardsh ncil
			standard does allow				communication with ASC, that	nature of PZQ was presented to SCS at the time				TOIL
			exception for benign				approval by SCS of the evidence of	of audit. Kampachi awaits further instructions.				
			treatment, continuing				"benign" treatment would be	A scan of the Rx will be uploaded to the				
			burden of proof is upon				sufficient, and that a VR was not	Dropbox.				
			Kampachi Mexico to				required. A copy of the Rx was shown					
			demontrate that any uses				to the auditors at the time of audit.					
			of praziquantel have no									
			deleterious impacts on									
			surrounding environment									
			or species.									
			OBSERVACIÓN: Si bien el									
			estándar permite la									
			excepción para un									
			tratamiento benigno,									
			Kampachi México continúa									
			con la carga de la prueba									
			- · · · · · · · · · · · · · · · · · · ·									
			para demostrar que									
			cualquier uso de									
			praziquantel no tiene									
			efectos perjudiciales en el									
			entorno o las especies									
			circundantes.									
19-06	6.4.1	Major	No evidence provided of	Based on document review including	February 1, 2019	Open	Kampachi did not keep a record of	A new officer with the required skills is now in	May 1, 2019)		
19-06	6.4.1	Major	The state of the s	Based on document review including Constancia dated 1/10/19 which indicates	February 1, 2019	Open	Kampachi did not keep a record of activities and capacitations provided	A new officer with the required skills is now in the position. Since then, participative internal	May 1, 2019)		
19-06	6.4.1	Major	knowledge of protocols	Constancia dated 1/10/19 which indicates	February 1, 2019	Open	activities and capacitations provided	the position. Since then, participative internal	May 1, 2019	9		
19-06	6.4.1	Major	knowledge of protocols and procedures by	Constancia dated 1/10/19 which indicates the company has begun verification process	February 1, 2019	Open	activities and capacitations provided to employees related to Health and	the position. Since then, participative internal evaluations have been carried out and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement	May 1, 2019)		
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature.	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The	February 1, 2019	Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan los procedimientos, ni de	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The interviews of the workers describe that		Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan los procedimientos, ni de capacitaciones de	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The interviews of the workers describe that there are no protocols or regular training on		Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan los procedimientos, ni de	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The interviews of the workers describe that there are no protocols or regular training on health and safety procedures implemented		Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan los procedimientos, ni de capacitaciones de	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The interviews of the workers describe that there are no protocols or regular training on health and safety procedures implemented thus far. Based on Fattening/growing site,		Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
19-06	6.4.1	Major	knowledge of protocols and procedures by employees, nor of trainings related to Health and Safety. This finding graded Major due to its apparent systemic nature. No hay evidencia de que los empleados conozcan los procedimientos, ni de capacitaciones de	Constancia dated 1/10/19 which indicates the company has begun verification process by Civil Protection, and Diagnostic process by Health and Safety Officer presenting participatory internal evaluation, and list of emergency contact numbers, these are the documented efforts that the company provides as evidence of their work in occupational health and safety. The interviews of the workers describe that there are no protocols or regular training on health and safety procedures implemented thus far. Based on Fattening/growing site, there are risks of limited walk space in the		Open	activities and capacitations provided to employees related to Health and Safety. The previous Health and Safety officer did not have adequate experience in administrative	the position. Since then, participative internal evaluations have been carried out and properly registered and a training and improvement program is in progress. All training activities will be properly documented. Records of previous activities will be updated and properly	May 1, 2019			
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										Aguacu	
19-07	6.4.3	Major	records or procedures for accidents. This finding graded Major due to its	Basado en revisión de documentos y entrevistas a personal administrativo, y trabajadores de la empresa. No es posible confirmar que exista registro de incidentes de primeros auxilios, o incidentes de acoso y se provea seguimiento según la política de la empresa. Based document review and interviews with administrative staff and company employees. It is not possible to confirm that there is a record of first aid incidents, or incidents of harassment. No documentary evidence exists of follow-up procedures.	February 1, 2019	Open	Kampachi did not keep record of training activities provided to employees related to Health and Safety. Previous Health and Safety officer didn't have experience in administrative procedures.	A new officer with the required skills is now in the position. Records of previous activities will be updated. Records and procedures for employees' accident cases will start to be properly managed and documented.	May 1, 2019	varc ncil	dshir
19-08	6.7.3	Major	records or procedures for harassment cases. This finding graded Major due to its apparent systemic nature. No hay evidencia de	Basado en revisión de documentos y entrevistas a personal administrativo, y trabajadores de la empresa. No es posible confirmar que exista registro de incidentes de primeros auxilios, o incidentes de acoso y se provea seguimiento según la política de la empresa. Based document review and interviews with administrative staff and company employees. It is not possible to confirm that there is a record of first aid incidents, or incidents of harassment. No documentary evidence exists of follow-up procedures.		Open	Kampachi did not keep records or procedures of harassment cases. Previous Health and Safety officer didn't have experience in administrative procedures.	A new officer with the required skills is now in the position. Records of previous harassment will be actualiazed / Records and procedures for employess for this cases will start to be properly managed and documented	May 1, 2019		
19-09	6.9.2	Major	place to ensure social compliances of its suppliers and contractors when contracted to operate on the farm site. This finding graded Major due to its apparent systemic nature. No es posible evidenciar	Basado en la revisión de documentos y entrevista de personal administrativo. No es posible evidenciar que la empresa tenga una política escrita que garantice el cumplimiento de condiciones sociales o leyes laborales de sus contratistas estén ellos operando en el sitio de la empresa. Based on document review and administrative staff interviews. It is not possible to evidence a policy in place to ensure social compliances of its subcontractors.	February 1, 2019	Open	Kampachi misunderstood this requirement.	A Memo has been drafted from the CEO that will state the following: "All management staff are hereby instructed to ensure that the following statement is included in all contracts with all their suppliers or service providers: 'Contractor hereby commits to meet all of the obligations and requirements of the "Ley Federal del Trabajo".' The Mexican "Ley Federal del Trabajo" meets all of the criteria of the ASC standard.	May 1, 2019		

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19-10	6.10.1	Major	There is no policy or grievance procedures available for workers. This finding graded Major due to its apparent systemic nature. No hay procedimientos de quejas o políticas disponibles para los trabajadores.	Basado en revisión de documentos, incluyendo "Employee Manual" el cual se encuentra en Ingles (y por ende no accesible a personal local) y esta basado en la empresa hermana de Kampachi México localizada en Estados Unidos. En el momento no existe una política sobre procedimiento de agravio/queja , o una política sobre resolución de conflicto. Sin embargo hágase notar que a partir de entrevistas a trabajadores, quienes describen líneas de comunicación accesibles y directas con sus supervisores no se reportan quejas, o indicadores de falta de acceso de comunicación. Based on document review, including "Employee Manual" which is in English (therefore not accessible to local employees) and is based on the sister company of Kampachi Mexico located in the United States. At the moment there is no policy on grievance procedure / complaint, or a policy on conflict resolution. However, it should be noted that from interviews with workers, who describe accessible and direct communication lines with their supervisors, no complaints are reported, or indicators of lack of communication.	February 1, 2019	Open	Kampachi administration has worked to ensure that there are direct channels of comunication between management and workers, but there have been no specific procedures established.	Kampachi will translate the current Employee Manual into Spanish, adding the procedure for filing, resolving and documenting grievances and complaints. A copy of this manual will be delivered to all workers. This distribution will be properly documented.	May 1, 2019	Stevar Counci
19-11	7.1.1	Minor		No existe evidencia de capacitación a la comunidad sobre entrenamiento sobre materiales de control utilizados para peces y posibles riesgos en la salud humana. Hágase notar que Kampachi México colabora de manera formal y regular con Instituciones gubernamentales y Educativas, sus sitios de reproducción y hatchery se localizan en instalaciones de CIBNOR y UNABCS, y de esta manera se evidencia comunicación abierta y constante con partes interesadas. There is no evidence of training to the community on training on control materials used for fish and possible risks to human health. Please note that Kampachi Mexico collaborates formally and regularly with governmental and educational institutions, its breeding sites and hatchery are located in CIBNOR and UNABCS facilities, and in this way there is evidence of open and constant communication with stakeholders.	February 1, 2019	Open	Kampachi misunderstood this requirement, and had not adequately documented such co-operation.	Kampachi currently has evidence of cooperation with the community and stakeholders locally and regionally. We will develop procedures facilitating and recording these ongoing contacts and more formal meetings	May 1, 2019	
19-12	7.1.2	Major	grievances. This finding graded Major due to its apparent systemic nature. No existe un sistema o	No se evidencian informes o registros escritos de queja o sugerencia identificadas por parte de la comunidad. No existe un sistema o procedimiento para esta función. There are no reports or written records of complaints or suggestions identified by the community. There is no system or procedure for this function.	February 1, 2019	Open	Kampachi Mexico did not adequately understand how to address this requirement.	Kampachi Mexico will establish procedures to address this deficiency, including adding a section to the website, placing bumper stickers on company vehicles with a contact phone number, and listing contact phone numbers and an address for complaints on signage for all company facilities.	May 1, 2019	



ASC Audit Report - Traceablity / Reporte de auditoría ASC - Trazabilidad

10 Traceability Factor / Factor de Trazabilidad	Description of risk factor if present / Descripción de los factores de riesgo, si están presentes	Describe any traceability, segregation, or other systems in place to manage the risk / Describir cualquier sistema de trazabilidad, segregación u otros implementados en sitio para manejar el riesgo
The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, present during production, harvest, transport, storage, or processing activities. / La posibilidad de mezcla o sustitución entre producto certificado y no certificado, incluyendo producto de la misma o similar apariencia o especies, presentes durante la producción, cosecha, transporte, almacenamiento, o actividades de procesamiento.	No Risk / No hay Riesgo	No risk of substitution of certified with noncertified product within the unit of certification as all fish in the farm are within the scope of the ASC Seriola/Cobia Standard audit. Transports are identifiable on production units (farm cage). The fish are transported from single cage the processing plant at a time. No existe riesgo de sustitución de producto certificado con no certificado dentro de la unidad de certificación, todos los peces del centro de cultivo están dentro del alcance de la auditoria del Estándar ASC Serila/Cobia. El transporte siempre es identificado a nivel de unidades productivas (jaula de cultivo). Sólo se transportan peces desde un centro de cultivo hasta la planta de proceso a la vez.
Any other opportunities where certified product could potentially be mixed, substituted, or mislabelled with non-certified product before the point where product enters the chain of custody / Cualquier otra oprotunidad donde producto certificado pudisese potencialmente mezclarse, sustituirse o perder su etiquetado con productos no certificados antes del punto donde los productos entren a cadena de custodia.	Low Risk /Bajo Riesgo	Since Seriola sp. is native to the area there is the possibility that wild caught fish could be mixed with farmed fish, however there is no large scale fishery of Seriola in the area. Dado que el jurel ocurre naturalmente en la zona, existe la posibilidad de que los peces capturados en el medio silvestre puedan mezclarse con los peces cultivados, sin embargo, no existe una pesquería a gran escala de jurel en la zona.
	Owned by client	Subcontracted by client
10.4.a Total number of sites owned/subcontracted by client producing the same species that is included in the scope of certification	1	0
Number of sites included in the unit of certification. Número de sitios incluidos en la unidad de certificación	1	0
	Site name(s) / Nombre (s) del sitio	Reason(s) / Razón (es)
10.4.b Site(s) within UoC that has product to be excluded from entering the chain of custody. Sitio (s) dentro de UoC que tiene producto a ser excluido de entrar en la cadena de	0	N/A

custodia.



10.5 Detail description of the flow of certified product system which allows product to be traced from final sale back to the unit of certification. Descripción detallada del flujo del producto certificado dentro de la operación y el sistema de trazabilidad asociado, que permita trazar el producto desde la unidad de certificación hasta su venta. El sistema de trazabilidad y segregación en la operación son suficientes para asegurar la identificación de todos los productos cultivados po la unidad de certificación hasta su venta como producto certificado, o bien sea considerado como apto para portar el logo ASC.

After requesting a permit for stocking from Comite de Sanidad Acuicola de Baja California Sur AC (Baja within the operation and the associated traceability California Sur Aquaculture Health Committee); each cage is stocked with a certificate of stocking. Farm keeps records of population, mortality and harvest records for each cage individually. Farm requests a harvest permit from the Mexican aquaculture authority- SAGARPA, farm is isued a permit identifying the farm, location, date, and also a permit for transport (Guia de pesca) which includes species, presentation, number and weight of fish harvested and transported. Records are submitted to and stamped by Comisión Nacional de Acuacultura y Pesca - CONAPESCA.

> Después de solicitar un permiso de siembra del Comité de Sanidad Acuícola de Baja California Sur, cada jaula se siembra con su respectivo certificado. La finca mantiene registros de población, mortalidad y registros de cosecha para cada jaula individualmente. La finca solicita un permiso de cosecha a la autoridad de acuicultura mexicana - SAGARPA, se le otorga un permiso que identifica la granja, la ubicación, la fecha y también un permiso de transporte (Guia de pesca) que incluye especies, presentación, número y peso de los peces capturados y transportados. Los registros son enviados y sellados por la Comisión Nacional de Acuacultura y Pesca - CONAPESCA.

10.6 <u>Traceablity Determination / Determinación</u> de la trazabilidad:

- 10.6.1 The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation originate from the unit of certification, or can be eligible to carry the ASC logo. El sistema de trazabilidad y segregación en la operación son suficientes para asegurar la identificación de todos los productos cultivados por la unidad de certificación hasta su venta como producto certificado, o bien sea considerado como apto para portar el logo ASC.
- 10.6.2 The traceability and segregation systems are not sufficient and a separate chain of custody certification is required for the operation before products can be sold as ASC-certified or can be eligible to carry the ASC logo. El sistema de trazabilidad y segregación en la operación son suficientes. De manera independiente se requiere la certificación de la cadena de custodia para la operación, antes de que los productos sean vendidos como productos certificados ASC o puedan ser considerados como aptos para portar el logo ASC.
- 10.6.3 The point from which chain of custody is required to begin. El punto desde el cual se requiere que la cadena de custodia comience.
- 10.6.4 Is a sepearate chain of custody certificate is required for the unit of certification? Se requiere certificado de cadena de custodia por separado del productor?

he traceability and segregation systems used in the operation are sufficient to ensure that all products
dentified and sold as certified originate from the unit of certification./El sistema de trazabilidad y de
egregación utilizados en la operación son suficientes para asegurar que todos los productos identificados
vendidos como certifica su origen en la unidad de certificación.

At processing plant.

Al llegar a la planta de proceso.

No.

N/A



ASC Audit Report - Closing

12 Evaluation Results

A report of the results of the audit of the operation 12.1 against the specific elements in the standard and guidance documents.

A clear statement on whether or not the audited unit of 12.2 certification has the capability to consistently meet the objectives of the relevant standard(s).

In cases where Biodiversity Environmental Impact
Assessment (BEIA) or Participatory Social Impact
Assessment (PSIA) is available, it shall be added in full to
the audit report. If these documents are not in English,
then a synopsis in English shall be added to the report as
well.

The company showed overall compliance with the ASC Seriola/Cobia standard. One (1) Major and 4 minor conformities (NC) in the technical principles and 6 Major and 1 Minor NC's in the social principles were raised during the audit.

La compañía mostró un buen cumplimiento general de la norma ASC de Seriola/Cobia. Se plantearon 1 NC conformidad mayor y 3 NC menores en los principios tecnicos y 6 NC mayores y 1 NC menor en los principios sociales durante la auditoría.

The audit team finds King Kampachi farm would be in compliance with the ASC Seriol/Cobia standard, after submittal of suitable corrective action plans for 8 Major and 4 Minor non-conformities that were identified during the audit

El equipo de auditoría encuentra que la piscicultura King Kampachi cumpliria suficientemente de acuerdo a la norma ASC Seriola/Cobia, despues de revisar planes de acción correctivos adecuados para 8 no conformidades mayores y 4 NC menores que fueron identificadas durante la auditoría.

N/A. No BEIA

13 Decision

- 13.1 Has a certificate been issued?
- 13.2 The Eligibility Date (if applicable)
- 13.3 Is a separate CoC certificate required for the producer?
- 13.4 If a certificate has been issued this section shall include:
- 13.4.1 The date of issue and date of expiry of the certificate.
- 13.4.2 The scope of the certificate
 Instructions to stakeholders that any complaints or objections to the CAB decision are to be subject to the CAB's complaints
- 13.4.3 procedure. This section shall include information on where to review the procedure and where further information on complaints can be found.

Pendiente/Pending

Date of certification Fecha de certificacion

No.

Pendiente/Pending

Pendiente/Pending

Any complaints or objections to the CAB decision are to be subject to SCS Global Services complaints procedure:

https://www.scsglobalservices.com/yourfeedback

14 Surveillance

14.1 Next planned Surveillance

14.1.1 Planned date

14.1.2 Planned site

February 1, 2020

King Kampachi, La Paz, BCS, Mexico

14.2 Next audit type

14.2.1 Surveillance 1

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MEMO: Use of Praziquantel as a benign treatment for skin flukes (Neobenedenia girellae) in the culture of Kampachi (Almaco Jack, Seriola rivoliana) in Mexico.

NAS - January 30th, 2019

Introduction: The Seriola-Cobia Standard Indicator 5.2.4 bans the use of ectoparasite treatments *except for fresh water, formaldehyde and peroxide, and "benign treatments"*. The term "benign treatments is footnoted (No. 30), stating "the ASC can make an exception for benign treatments. The burden of proof for a benign treatment that has no impacts on the surrounding environment or species is the responsibility of the producer").

This memo provides the evidence for ASC to provide such an exception for the "benign" use of Praziquantel (PZQ), when administered to kampachi (Almaco Jack, *Seriola rivoliana*) by Kampachi Mexico, S. de R.L. de C.V., to control ectoparasitic skin flukes (*Neobenedenia girellae*) under the following conditions. The company's integrated fish health management plan states that any PZQ treatments by Kampachi Mexico must be:

- i. in compliance with the Mexican laws for administration of veterinary therapeutants;
- ii. in compliance with import regulations of any countries to which King Kampachi™ are exported;
- iii. conducted only with the approval of, and under the supervision of, the company fish health management specialist;
- iv. specifically to address skin fluke (*N. girellae*) infestations (i.e. PZQ shall not be administered prophylactically);
- v. only for short periods, conforming to veterinary guidelines, and not continuous, to reduce the chance of the development of drug resistance; and
- vi. combined with other treatments and control strategies, such as fresh water, peroxide, copper mesh alloy netting, and net pen cleaning to remove biofouling, to reduce the chance of the development of drug resistance.

With experience, we expect to be able to establish a threshold level of skin fluke infestations which, when attained, would justify PZQ treatment. At this early stage in farm development, however, we do not have sufficient information to establish such a threshold.

<u>Justification:</u> Justifications for consideration by ASC of PZQ as "benign treatments" include:

- 1. PZQ is used in both human medicine, and in other veterinary treatments, and has shown to have no residual by-products that may impact the environment.
- 2. PZQ is widely used to control monogenean worm infections in aquariums, dogs and cats, and farm animals, in both the US and the UK.

- 3. Although PZQ is listed on the <u>World Health Organization's List of Essential Medicines</u>, its use for treating ectoparasites of marine fish in no way represents any risk to human health. There is no possibility that if *Neobenedenia* became resistant to PZQ, that these parasites could infest humans, as they are only found in the marine environment.
- 4. Development of *Neobenedenia* strains that were resistant to PZQ would represent no significant risk to wild fish populations.
- 5. Development of *Neobenedenia* strains that were resistant to PZQ would represent a significant impact to commercial operations that were culturing *Seriola*, and other marine fish. This impact would be primarily in the reduced effectiveness of PZQ treatments. However, this possibility should not preclude its judicious, periodic use in responsible aquaculture operations.
- 6. PZQ is only one tool of several that Kampachi Mexico is committed to using for skin fluke management. Other strategies include deep water siting, cross-current orientation of net pens, copper-alloy mesh material for pen netting, use of alternative therapeutants such as peroxide treatment and freshwater baths (for small numbers of fish); and use of other non-therapeutic in-feed additives to improve fish health, resistance to ectoparasites and immunity to secondary infections (which are the primary cause of mortalities associated with skin fluke infestations).
- 7. PZQ is very expensive. Regular use of PZQ is therefore not commercially advantageous, and is usually only recommended for smaller fish (during the nursery stage), where the quantities required are minimal.
- 8. PZQ is almost always administered as a feed additive (and would only ever be administered by this means by Kampachi Mexico), so there is no direct impact on effluent water, other than byproducts or excess PZQ excreted by the fish.
- 9. There is evidence that PZQ degrades naturally in a matter of a few days, and so it does not persist in effluent ocean water or the sediment.
- 10. PZQ is only effective at dosages at or above 2 ppm (which would be rapidly diluted in the ocean environment see Thomas, et al., 2016), and so it would not continue to have lethal effects on other parasites in the wild.

References:

Thomas, A., M. R. Dawson, H. Ellis, and M.A. Stamper. 2016. Praziquantel degradation in marine aquarium water. PeerJ. 2016; 4: e1857. Published online 2016 Apr 4. doi: 10.7717/peerj.1857

Williams, R.E., I. Ernst, C.B. Chambers and I.D. Whittington, 2007. Efficacy of orally administered praziquantel against *Zeuxapta seriolae* and *Benedenia seriolae* (Monogenea) in yellowtail kingfish *Seriola lalandi*. <u>Dis. Aquat. Org.</u> **77:** 199 – 205.

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