

Core/ Module	Clause Number	Comment	Proposed Change	GSA Response
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Public Comments on GSA Seafood Processing Standard Issue 6.0 and GSA Responses

Animal Welfare	AW1, AW2	<p>Fish are sentient beings that can feel pain, distress, and other emotions. Live transport of fish can be stressful and, if not well managed, it comes with significant welfare risks. Paying attention to fish welfare during transport is essential for the survival of the fish during transport and for reducing incidences of disease following transport. Water quality parameters, stocking densities, starvation times, loading and unloading procedures are key factors for fish welfare during transport and need to be planned before the journey. Also, potential delays should be taken into account and be included in the planning and preparations.</p> <p>Current fish transport standards do not specify water quality variables, starvation times, methods of loading and unloading or allowed stocking densities. We suggest that BAP establishes more specific recommendations in their standards.</p>	<p>We suggest adding the following points in The Transport Standard Operating Procedures:</p> <ul style="list-style-type: none"> • Live transport must be minimized wherever possible in favor of on-site slaughter. • Transport must be planned in order to minimize possible adverse effects on fish welfare. Water quality, temperature, journey length, species, life-stage, and stocking densities must especially be taken into account in planning the journey. • Operators must be trained to have control systems for maintaining vehicles and equipment, exchanging water, handling dead fish, and record keeping. Training must include knowledge of the transported species, its needs and behavior, and understanding and how to react to stress and disease. • Fasting periods must be minimised, being no longer than is required for fish welfare benefits (i.e. to reduce oxygen requirements and waste 	<p>The following considerations have already been added into the Animal Welfare Module guidance document based on Technical Committee input:</p> <ul style="list-style-type: none"> - AW1: The intent of this clause is to ensure that during live transport, the welfare of aquatic animals is maintained. The standard operating procedure shall include at a minimum: - •Planning for transport - •Maintaining water quality appropriate for species - •Procedures to minimize biosecurity risks, physical injuries, and mortalities - •Cleaning and disinfection of transport tanks or containers - •Water temperature appropriate for the species - •Contingency plans - •Established densities for each species during transport <p>GSA agrees the following practices provide helpful guidance to facilities and auditors regarding best practice, and will therefore include the recommended provisions into the Animal Welfare Module guidance document:</p> <ul style="list-style-type: none"> - AW1: Live transport should be minimized wherever possible in favor of on-site slaughter - AW6: Live transport training should include aspects of maintaining vehicles and equipment, exchanging water, handling dead fish, record keeping, knowledge of the
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			<p>accumulation in the water), and must not exceed 72 hours for each fish.</p> <ul style="list-style-type: none"> • Fish must be inspected for fitness to transport and must not be loaded if showing signs of disease, physical damage, or unusual behaviour, or if they have recently been exposed to a significant stressor. • Monitoring, maintaining, and reporting water quality parameters is required. Contingency plans (e.g. carrying 50% more oxygen than required for the intended journey) must be in place on site in case of a lapse in quality. • The overall loading and unloading time must be kept to a minimum and performed according to best handling and crowding practices [BAP should provide these]. Crowding must be carried out in steps and without invoking a significant stress response. The use of fish pumps is preferred to the use of nets for moving and loading fish. • Removal of fish from water must be avoided, but where necessary must be minimised and in no case be longer than 15 seconds. 	<p>transported species, its needs and behavior, and understanding and how to react to stress and disease.</p> <ul style="list-style-type: none"> - AW1: Fasting before transport should not exceed 72 hours. - AW1: Planning for transport: Fish should be inspected for fitness to transport and must not be loaded if showing signs of disease, physical damage, or unusual behaviour, or if they have recently been exposed to a significant stressor. - AW1: The overall loading and unloading time should be kept to a minimum and performed according to written Transport Standard Operating Procedures. Crowding should be carried out in steps to minimize significant stress response - AW1: Removal of fish from water should be minimized. - AW1: Fish should be made accessible for inspection at all times, unless legally prohibited.

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			<ul style="list-style-type: none"> Water quality parameters must be monitored during transport and match with arrival tanks. Fish must be accessible for inspection at all times. 	
Animal Welfare	AW3, AW4	<p>Worldwide billions of fish are slaughter in aquaculture production systems and the vast majority are currently killed using inhumane methods such as live chilling in ice slurry and exposure to carbon dioxide in water.</p> <p>The World Organization for Animal Health (WOAH) 'Aquatic Animal Health Code' outlines conditions for humane slaughter of fish and it states that the method used for stunning should be adequate for each species and shall render the aquatic animal immediately and fully unconscious. If the stunning is not irreversible, fish should be killed before consciousness is recovered. Therefore, BAP should ensure that humane slaughter methods are used in their certified farms.</p>	<p>The Seafood Processing Standard (SPS) only states that animals shall be quickly rendered unconscious by humane means but gives no specific details or indications. Therefore, mandatory species-specific humane slaughter methods need to be required by BAP, date of implementation needs to be established and the use of ice slurry prohibited.</p> <ol style="list-style-type: none"> 1. Automated percussive and electrical stunning (followed by a suitable killing method where percussion or electrical methods do not also kill) must be required . 2. Inhumane slaughter methods must not be used and must phased out of the supply chain. Inhumane methods used commercially include: live chilling in ice slurry (without effective pre-stunning), exposure to carbon dioxide in water, asphyxiation in air, bleeding without effective pre-stunning, and the use of salt or ammonia baths (for eels). 	<p>The following considerations have already been added into the Animal Welfare Module guidance document based on Technical Committee input:</p> <p>GSA agrees the following practices provide helpful guidance to facilities and auditors regarding best practice, and will therefore include the recommended provisions into the Animal Welfare Module guidance document:</p> <ul style="list-style-type: none"> - AW4: The following indicators should be considered to establish effectiveness of stunning in the SSOP: - No response to: swimming behavior, righting ability, handling, stimulus (i.e. pin prick), eye roll, and no observed regular opercular movement. - Humane slaughter methods appropriate for the species should be utilized at all times. Facilities should be able to explain the appropriateness of slaughter methods in regards to humane treatment. According to BAP, inhumane treatment includes carbon dioxide in water, asphyxiation in air, bleeding without effective pre-stunning, and the use of salt or ammonia baths. - AW3: Fasting before slaughter should not exceed 72 hours. - AW3: Pre-slaughter crowding should be minimized in both duration and severity.

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			<p>3. Pre-slaughter fasting periods must be minimised, be laid down for each species and must never exceed 72 hours (unless required by a veterinarian for an exceptional reason).</p> <p>4. Pre-slaughter crowding must be minimised in duration and severity, as much as possible. Fish must not be crowded for any longer than 2 hours and crowding must be carefully managed to ensure no vigorous activity is observed; e.g., only occasional fins breaking the surface of the water should be observed.</p> <p>5. Fish should be moved to the point of slaughter via in-water pumping systems. These must be carefully designed and managed to ensure gentle movement of fish through pipes, including monitoring of injuries, such as fin injuries, with immediate action if higher levels are detected. Use of nets to move fish must be avoided.</p> <p>6. The welfare of fish at slaughter must be monitored by signs of unconsciousness and indicators of stress.</p> <p>We have also some suggestions for specific species.</p>	<p>The language of AW4 will also be amended to include the required provisions of humane stunning and slaughter.</p> <p>At this time, in-water pumping to move fish is not considered a viable best practice for facilities globally. Moving forward, GSA will assess this provision and determine when a broader requirement is feasible.</p> <p>Species-specific recommendations have been considered through the additional guidance to AW4. No additional species requirements will be implemented at this time.</p>

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			<p>For Atlantic salmon:</p> <ul style="list-style-type: none"> • The use of a single method (i.e. percussive blow or electrocution) that both stuns (instantly) and kills is recommended above other methods where possible. • Percussive or electrical stunning followed by a separate kill method is also acceptable, providing fish do not regain consciousness after stunning. • Acceptable post-stun kill methods: are effectively performed percussion, decapitation, spiking/coring or a gill cut (following an effective percussive stun only). • The use of carbon dioxide systems for Atlantic salmon is unacceptable and must be phased out. <p>For rainbow trout: •</p> <p>The use of a single method (i.e. percussive blow or electrocution) that both stuns (instantly) and kills is recommended above other methods where possible.</p> <ul style="list-style-type: none"> • Percussive or electrical stunning followed by a separate kill method is also acceptable, providing fish do not regain consciousness after stunning. • Acceptable post-stun kill methods: are effectively performed percussion, decapitation, spiking/coring or a gill cut (following an effective percussive stun and for large trout only) 	

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			<ul style="list-style-type: none"> • The use of carbon dioxide systems, live chilling in ice slurry, and leaving trout to asphyxiate in air, are unacceptable killing methods and must be phased out. For gilthead sea bream and European sea bass: • The use of a single method (i.e. electrocution) that both stuns (instantly) and kills is recommended above other methods where possible. • Electrical stunning followed by chilling in ice slurry to kill is acceptable provided that fish do not regain consciousness. • Live chilling in ice slurry without effective pre-stunning, and leaving sea bass and bream to asphyxiate in air, are unacceptable killing methods and must be phased out. 	
Animal Welfare	A1-AW5	The words “processing plant”, “processor” and “facility” and “Facilities” are used throughout these clauses.	If “processing plant” and “facility” are the same then could the wording please be standardized so it is clear, if these are different then could these, please have a definition as to what they are?	The language of clause AW1 will be amended to change “Processing Plant” to “Processing Facility.” This will create consistency across the Animal Welfare Module.
Animal Welfare	AW1	Live animals	Could it please be made clear under a definition what is considered under the scope of live animals? For example, for Aquaculture finfish does this cover transport of “ova” and “smolt” or just the final step i.e., “farm to harvest” or “harvest to facility”	The language of clause AW1 will be amended to state: “Live animals (post-hatch)....”
Animal Welfare	AW3-AW6	Slaughter - In Aquaculture down this side of the world we tend to steer away from using these phrases, as there can be negative connotations with the phrase “Slaughter” when	Could the word “Slaughter” be changed to “Harvest”, The term “Slaughter” is used in the red meat industry, whereas “harvest” is used for Aquaculture finfish and shellfish. Or could both be used as inter-changeable.	GSA respects the concern regarding negative connotations, as well as regional differentiation in terminology, however “harvest” is not reflective of the accepted global verbiage in relation to end of life procedures in animal production.

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		dealing with or describing animal welfare.		
Animal Welfare	AW1, AW2	<p>Transportation of aquatic animals involves collection, loading, transport, unloading and stocking and can induce significant stress responses from which the animals will need to recover. Poor conditions during transport, such as overcrowding and inadequate water quality, can cause irreparable damage or death to the animals. The circulation of low-volume water means transport is fundamentally a risky activity, as there is little room for error if standards lapse or equipment fails. As such, live transport should be minimized wherever possible in favor of on-site slaughter, and minimal time spent in transportation boats.</p>	<p>Add as a general comment:</p> <p>1. Live transport should be minimized wherever possible in favor of on-site slaughter.</p> <p>4. Transport measures (e.g. stocking density, water quality, temperature) should be appropriate for the species being transported and the method of transportation.</p> <p>5. Monitoring, maintaining, and reporting these water quality parameters is required. Contingency plans (e.g. bottled oxygen) must be in place on site in case of a lapse in quality.</p> <p>The documentation accompanying the consignment (transport log) should include: a) description of the consignment (e.g. date, time, and place of loading; species; and biomass load); b) description of the transport plan (e.g. route; water exchanges; expected time, date and place of arrival and unloading; and receiver contact information).</p> <p>7. Animals should not be loaded until the required log documentation is complete.</p>	<p>The following considerations have already been added into the Animal Welfare Module guidance document based on Technical Committee input:</p> <ul style="list-style-type: none"> - AW1: The intent of this clause is to ensure that during live transport, the welfare of aquatic animals is maintained. The standard operating procedure shall include at a minimum: - •Planning for transport - •Maintaining water quality appropriate for species - •Procedures to minimize biosecurity risks, physical injuries, and mortalities - •Cleaning and disinfection of transport tanks or containers - •Water temperature appropriate for the species - •Contingency plans - •Established densities for each species during transport <p>GSA agrees the following practices provide helpful guidance to facilities and auditors regarding best practice, and will therefore include the recommended provisions into the Animal Welfare Module guidance document:</p> <ul style="list-style-type: none"> - AW1: Live transport should be minimized wherever possible in favor of on-site slaughter <p>GSA agrees that the provisions of AW2 currently meet the recommendations regarding transport log details.</p>

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			<p>8. The transport log should be made available to the dispatcher and the receiver of the consignment. Transport logs should be centrally and regularly published.</p> <p>9. As transport distance is minimized, there is less need to lower the metabolic rate of fishes in transport. As such, temperature change during transport should be minimized.</p> <p>10. Appropriate stocking densities during transportation must be respected. If transport-specific stocking densities are not specified, we recommend defaulting to standard holding stocking densities.</p>	<p>Regarding point #7, GSA believes that an accurate transport log cannot be achieved unless completed post-transport, and therefore the recommendation should not be implemented.</p> <p>Regarding point #8, GSA recommends adding an additional clause AW2.2 stating: "Transport logs shall be signed by the shipping and receiving facilities, including date and time."</p>
Animal Welfare	AW3	There should be more robust animal welfare requirements listed for the Live Holding Standard Operating Procedures and a verification process to ensure all facilities are upholding optimal welfare conditions during this process. A designated employee that is adequately trained to monitor and assess animal welfare for the species being held must be present, and adjustments must be made if welfare is compromised.	<p>The Live Holding Standard Operating Procedures that state the requirements of holding live animals at the facility must include at least: density, water quality, dissolved oxygen levels, temperature control, holding duration, crowding methods, animal behavioral indicators, and fasting suitable for the species being held. For example:</p> <p>The duration of fasting prior to slaughter, transportation or handling operations must not exceed the minimal time needed to achieve gut clearance. For salmonids, we recommend a maximum fasting duration of 20 degree-days for fish under 500 g of body weight, and of 30 degree-</p>	<p>GSA agrees the following practices provide helpful guidance to facilities and auditors regarding best practice, and will therefore include the recommended provisions into the Animal Welfare Module guidance document:</p> <ul style="list-style-type: none"> - AW1: Fasting before transport should not exceed 72 hours. - AW3: Fasting before slaughter should not exceed 72 hours. <p>Additionally, GSA recommends including "holding duration" and "crowding methods" to the Live Holding Standard Operating Procedures requirements in clause AW3.</p>

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			days for fish above 500 g. For sea bass and sea bream we recommend a maximum duration of 50 degree-days. Other species-specific maximum fasting durations may be included in this standard if GSA has scientific information to support specific thresholds. When there is no scientific information available, there should also be a default rule stating a maximum fasting duration, for example 50 degree-days or 72h.	
Animal Welfare	AW4	<p>The World Organisation for Animal Health (WOAH) 'Aquatic Animal Health Code' outlines conditions for humane slaughter of fish. This code states that "Effective stunning should be verified by the absence of consciousness", and fishes should not regain consciousness before death.</p> <p>This means that the method used for stunning should be adequate for each species and shall render the aquatic animal immediately and fully unconscious (i.e. within one second by a scientifically-validated method) and not just immobilize the animal. Death must be induced without consciousness recovery. All stunning and slaughter equipment must be calibrated</p>	<ol style="list-style-type: none"> 1. Any recommendations are in addition to rather than in lieu of compliance with the WOAH's 'Aquatic Animal Health Code' (2023). 2. Slaughter should be performed directly at the rearing facility to prevent additional handling and transport. New facilities should have on-site slaughtering with effective stunning. 3. In order to minimize the risk of consciousness being recovered, time elapsed between stunning and slaughter must be minimized. Concurrent methods of stunning and slaughter (e.g. electronarcosis leading congruently into electrocution) are preferred, but processes where death supervenes without significant risk of recovery of consciousness are acceptable. 4. All stunning and slaughter equipment must be calibrated appropriately for the specific animals to be processed 	<p>GSA agrees the following practices provide helpful guidance to facilities and auditors regarding best practice, and will therefore include the recommended provisions into the Animal Welfare Module guidance document:</p> <ul style="list-style-type: none"> - AW4: Time elapsed between stunning and slaughter should be minimized. - AW4: The Slaughter Standard Operation Procedure shall include provisions for calibration of all stunning and slaughter equipment. - AW1: Removal of fish from water should be minimized. - AW1/3/4: Handling of live fish should be minimized. - AW4: The Slaughter Standard Operating Procedure shall contain contingencies for cases where the stunning process is determined to be ineffective or inconsistent. - Humane slaughter methods appropriate for the species should be utilized at all times. Facilities should be able to explain the appropriateness of slaughter methods in regards to humane treatment. According to BAP, inhumane treatment includes carbon dioxide in water, asphyxiation in air, bleeding

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		<p>appropriately for the specific species to be processed, in order to achieve immediate and irreversible stun. A back-up system must be provided in case of primary equipment failure.</p> <p>It is also imperative that we acknowledge "pre-slaughter handling" as a crucial part of the animals' experience during the overall slaughtering process, which could include sudden disturbances, removal from water, withdrawal of food, crowding, and any associated transportation.</p>	<p>(in terms of species, body size, and life stage), in order to achieve immediate and consistent loss of consciousness.</p> <p>5. 'Loss of consciousness' and 'full brain death' are terms to be determined under lab conditions using an electroencephalogram.</p> <p>6. Invertebrates, who lack a central nervous system and as such cannot be killed by decapitation, must not be decapitated or spiked.</p> <p>7. CCTV must be installed to provide clear footage of the back-up stun process.</p> <p>8. Fish should be kept in water as much as possible before and during the process of stunning while they are still conscious. If air exposure is unavoidable, it should be kept as short as possible and should not exceed 15 seconds to avoid oxygen deprivation.</p> <p>9. Direct handling of fishes should be avoided as much as possible.</p> <p>10. All staff should be properly trained to conduct slaughter operations effectively and to identify signs of unconsciousness and signs of consciousness.</p> <p>11. Fish showing signs of consciousness after stunning, be it due to a mis-stun or recovery of consciousness before death, should be</p>	<p>without effective pre-stunning, and the use of salt or ammonia baths.</p> <p>At this time, GSA does not consider the recommendations made in points 5, 6, 7, and 14 to be applicable to the Animal Welfare Module and will be excluded from this revision.</p> <p>Point 2 is for the farm standard then.</p> <p>The recommendations of point 10 are appropriately covered within clause AW6.</p> <p>GSA recommends adding to the language of clause AW4.1 "Fish exhibiting signs of sensibility or ineffective stunning shall be re-stunned prior to slaughter."</p>

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			<p>re-stunned. Emergency stunning can be performed manually, with methods which have been proved to be effective and appropriate for the species.</p> <p>12. Slaughter plants should regularly perform auto-controls by checking for signs of consciousness, and assessing the effectiveness of their procedures and equipment. Any oddity in stunning failure rates should lead to stopping the slaughter line until the problem is investigated and fixed.</p> <p>13. Immersion of conscious fish in ice slurry or icy water, asphyxia by air exposure, exsanguination without prior stunning, salt baths, and immersion in CO2 saturated water are all prohibited.</p> <p>14. All mortality events must be recorded, and centrally published.</p>	
Animal Welfare	Scope		<p>The scope of the Animal Welfare Module should also include clauses for wild-caught species in terms of transport, holding facilities and slaughter.</p> <p>For fisheries where the catch is kept alive after capture, species-specific live storage should be required for improved animal welfare and product quality. This includes:</p> <p>Storage and transport of live fish: Fish should be brought on</p>	<p>At this time, the scope of the SPS Animal Welfare Module will be restricted to farm-raised aquatic species. The SPS 6.0 development process has emphasized increasing applicability to the wild-capture seafood industry, folding in relevant changes and requirements throughout. As these considerations were made across all four pillars of the SPS assurance platform, it was determined that the best practice animal welfare requirements for wild-capture processors are not as clearly agreed upon, and that additional effort is needed to achieve consensus across GSA's multi-stakeholder approach to standards development. GSA is committed to increasing the</p>

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			<p>board as quickly as possible and transferred to tanks made for holding live fish with species-specific parameters (e.g. stocking density, water quality, temperature). Storage compartments or tanks must have a flat bottom with a sufficient oxygen supply which is calibrated to the quantities of fish being loaded and stored. As sufficient oxygen levels are particularly vital during loading of live fish, the oxygen levels must be monitored closely and continuously adjusted both when loading and keeping the fish in storage. Only undamaged fish should be stored alive.</p> <p>Slaughter: For fish that are to be slaughtered onboard, methods should align with guidelines set by the World Organisation for Animal Health (WOAH) Aquatic Animal Health Code as minimum standards. Additionally, to ensure the humane treatment of aquatic animals caught by fishing vessels, all operators must stun the animals before slaughter. This requirement</p>	<p>scope of the SPS Animal Welfare Module to include requirements for wild-capture seafood processors that reflect agreed science, best practice, and responsible seafood production in future revisions. We encourage participants in this industry, along with any other informed stakeholders, to provide ongoing input to GSA on developing best practice implementation in this regard at https://www.globalseafood.org/contact/.</p>

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			applies to all commercial licensed fishing vessels irrespective of vessel length or tonnage. The choice of the stunning method needs to take species-specific parameters where available and shall render the animal consciousness until death. A backup stunning system is necessary. Any aquatic animal that is misstunned or regains consciousness before death should be re-stunned as soon as possible. Injured or moribund fish should be separated and killed humanely.	
Animal Welfare	Scope		“The scope of this module is <i>wild-caught and</i> farm raised aquatic animals and includes transportation, holding, stunning and slaughtering”	At this time, the scope of the SPS Animal Welfare Module will be restricted to farm-raised aquatic species. The SPS 6.0 development process has emphasized increasing applicability to the wild-capture seafood industry, folding in relevant changes and requirements throughout. As these considerations were made across all four pillars of the SPS assurance platform, it was determined that the best practice animal welfare requirements for wild-capture processors are not as clearly agreed upon, and that additional effort is needed to achieve consensus across GSA’s multi-stakeholder approach to standards development. GSA is committed to increasing the scope of the SPS Animal Welfare Module to include requirements for wild-capture seafood

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				processors that reflect agreed science, best practice, and responsible seafood production in future revisions. We encourage participants in this industry, along with any other informed stakeholders, to provide ongoing input to GSA on developing best practice implementation in this regard at https://www.globalseafood.org/contact/ .
Animal Welfare	AW1	The transportation of animals should be done in a way which ensures the highest possible level of animal welfare. The Transport Standard Operating Procedures must also be sufficiently detailed to ensure these standards can be met. This document should set out what elements should be contained within the TSOP.	"Live animals shall be transported to processing plants and other markets in a manner that provides <i>the highest possible</i> level of animal welfare and minimizes stress. This shall be documents in a Transport Standard Operating Procedure and contain <i>detailed</i> guidance as relevant to each species <i>in particular with regard to space, ventilation, temperature and security and with such supply of liquid and oxygen, as are appropriate</i> .	GSA agrees with the recommendations provided and have previously included such points in the auditor and facility guidance for AW1: <ul style="list-style-type: none"> - AW1: The intent of this clause is to ensure that during live transport, the welfare of aquatic animals is maintained. The standard operating procedure shall include at a minimum: - •Planning for transport - •Maintaining water quality appropriate for species - •Procedures to minimize biosecurity risks, physical injuries, and mortalities - •Cleaning and disinfection of transport tanks or containers - •Water temperature appropriate for the species - •Contingency plans - •Established densities for each species during transport
Animal Welfare	AW2.1	In addition to the logbook being reviewed minimum weekly by facility management, it is also important that there is external, independent oversight of the processes involved. This will not only increase accountability but will also ensure	In addition to the logbook being reviewed minimum weekly by facility management, it is also important that there is external, independent oversight of the processes involved. This will not only increase accountability but will also ensure best	GSA recommends adding an additional clause AW2.2 stating: "Transport logs shall be signed by the shipping and receiving facilities, including date and time." Additionally, annual, independent, accredited third-party audits that occurs through the BAP/BSP

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		best practice can be followed throughout the sector.	practice can be followed throughout the sector.	assurance process provide an appropriate level of logbook review to the slaughter process.
Core	8.2.1	Traceability KDEs for farmed raised and for wild caught species should add a requirement for animal welfare data, as more and more seafood buyers are now requiring animal welfare policies from their suppliers.		At present, GSA has not received input or a request to require any specific animal welfare KDEs in SPS. As agreed indicators are developed within the industry, GSA will look to understand how these should be implemented into traceability reporting.
Core	8.2.2	Traceability of Raw Material	Add requirement on: stunning & slaughter methods, if applicable.	Stunning and slaughter records are expected to be retained at the facility for reference, however are not required as a traceability reporting component at this time.
Core	New	We suggest that BAP adds a sub-clause to include reference to living wage. This could be step-wise to gradually implement it, starting with calculation, then identifying gaps and finally meeting living wage for all workers.	The facility shall calculate the living wage for all their workers. Once this is known then the gaps between worker pay and the living wage are to be identified. The facility makes a commitment and policy to pay all workers at least the living wage. The facility shall implement a plan for paying all workers at least the living wage (within a maximum period of 5 years).	GSA will add the living wage clause from ESS but suggest that completing in 5 years may not be possible suggest this could be added at the next issues of the SPS Proposed Action- 2.2 The facility shall have a plan, that is reviewed at least annually, to instigate a living wage pay policy for their workers that shall be based on local assessment of the wage requirements to cover the workers' basic expenses and allow for some discretionary funds for use by workers and their families.
Core	New	Please consider including responsible recruitment clauses from ESS in the Core.	Add these clauses from ESS to SPS 6.0 6.4 The facility shall have a policy reflecting the Employer Pays Principle that is publicly available and communicated to all workers,	GSA proposed the following addition following conversations with interested stake holders

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			<p>recruitment agencies, and other business partners.</p> <p>6.4.1 If workers have paid recruitment fees or related costs, the facility shall document and reimburse the fees in a timely manner, no longer than 1 month after the fees have been discovered and shall develop a plan to prevent such fees from being charged in the future.</p> <p>6.5 The facility shall maintain a list of all the recruitment agencies they use and have a documented process to monitor them on an annual basis to ensure they continue operating legally and ethically. Records shall be stored, and corrective action plans should be kept and monitored.</p>	<p>GSA suggest to add new clauses in the Hiring and Terms of Employment section:</p> <p>5.6.4 The facility shall have a policy reflecting the Employer Pays Principle that is publicly available and communicated to all workers, recruitment agencies, and other business partners.</p> <p>5.6.5 The facility shall maintain a list of all the recruitment agencies they use</p>
Core	-	Please consider including the living wage clause from ESS in the core.	<p>Add this clause from ESS to the Core:</p> <p>2.2 The facility shall have a plan to instigate living wage pay policy for their workers that shall be based on local assessment of the wage requirements to cover the workers' basic expenses and allow for some discretionary funds for use by workers and their families.</p>	
Core	4.5.1	It is no clear if the requirement "Pathogen testing must not be conducted in the same location as the processing facility", is applicable for all kind of in house-laboratories, those located out of the processing areas	Expand the description of the requirement in such a way that it is clear for facilities that have internal laboratories, which can be located inside the processing areas as well as in separate buildings, if the clause is applicable for both of them.	SPS development team agrees and proposes rewording the clause to provide clarification on location and what type of testing is allowed in each location. SPS recommends updating the last sentence: If pathogen testing is conducted internally the laboratory shall provide evidence

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		(separated building) or just for laboratories inside processing areas.		that it is fully isolated from processing and storage areas.
Core	5.5.1, 6.1.1a, 6.1.7a, 6.1.7b, 6.2.1	The requirement is written as a question not as a statement. It seems as a guide for the auditor and is no clear what the facility should be meeting.	Specify as an auditable clause, making clear the obligation for the facility.	Theses clauses are data collection points only , SPS development team proposes adding in the guidance or within the clause that these are for data points only
Finished Product Testing	Scope	The use of the words “antimicrobial residues” needs to be better defined what its referring too. We understand it referring to use in Aquaculture from reading between the lines however, antimicrobials can be used in processing as processing aides to reduce/prevent growth of pathogens in products	Clearer define the intention of “antimicrobial residues” from aquaculture use not processing.	GSA Plans to revise language to chemical residues listed in table FPT 2.0 throughout the FPT module and annex 1.
Finished Product Testing Operational Guidance	1.1.2, 1.1.3, 1.1.4	The use of the words “antimicrobial residues” needs to be better defined what its referring too. We understand it referring to use in Aquaculture from reading between the lines however, antimicrobials can be used in processing as processing aides to reduce/prevent growth of pathogens in products	Clearer define the intention of “antimicrobial residues” from aquaculture use not processing.	GSA Plans to revise language to chemical residues listed in table FPT 2.0 throughout the FPT module and annex 1.
Finished Product Testing Operational Guidance	1.1.3, 1.1.4, 1.1.5	We trying to understand the intention here around the need for 1-day targeted audit without any evidence of the severity. This could result in certification holders not reporting in the fear of this. There are also examples where markets have not declared a new MRL or testing at a LOD that have resulted in border issues. These are then often dealt	Would it not be better to say that items of non-conformance listed in 1.1.3 - 1.1.5 are notified to GSA and certification body along with a report and these will be considered/followed up as part of the next certification audit? This way the severity could be better understood to allow for time allocation, i.e., something at the minor end could be a couple of hours to major end of a day extra?	SPS review agrees that the proposed process of reviewing the corrective actions and follow up to determine the audit duration.

Core/ Module	Clause Number	Comment	Proposed Change	GSA Response
		with between the government depts and then incorporated into market access requirements?		
Finished Product Testing Operational Guidance	1.1.5	We need to better define a failed "finish product testing"? What does this mean? For example, are we talking about pathogen failure or quality failure? Both have different implications i.e., pathogens are of a "food safety" concern (ill/kill), whereas others might only effect quality, not a "food safety" issue.	Needs to be defined what is intended are "Finished product testing". In our opinion this would be pathogens, not quality indicators.	The criteria listed in table FPT1 are not quality indicators. The organisms listed are pathogenic organisms that if detected in the finished product could potentially cause food borne illness. SPS suggests changing the word "fails" to: <i>does not meet GSA Action levels specified in Finished Product Testing Tables 2,3, and 4.</i>
Finished Product Testing Operational Guidance	2.4.5	We would like to understand where the figure of 750gms came from? What if the individual sample in its arrival form is <750gms?	Clear understanding for scenario where sample size is <750gms. i.e., smaller fish/portion?	
Finished Product Testing Operational Guidance	Table 2	Microbiological criteria for <i>Listeria</i> spp. Why is this not <i>Listeria monocytogenes</i> ? As this is the only pathogenic specie currently. Other species although not wanted are indicators only. Remembering that other species can be tolerant to controls in place for <i>Listeria monocytogenes</i> . It is understood for example some strain of <i>Listeria innocua</i> can be more heat tolerant. To reject for another <i>Listeria</i> spp than <i>Listeria monocytogenes</i> seems harsh. What is the intend around broadening to <i>Listeria</i> spp?	Would recommend changing to <i>Listeria monocytogenes</i> as this is the pathogen strain of concern. If another specie is found this can be noted from a hygiene perspective.	SPS selected the microbiological criteria as <i>Listeria</i> spp. as a way to provide flexibility and cost reduction for the facility. The cost of testing <i>listeria</i> spp. is typically less than for <i>Listeria monocytogenes</i> . However, if a positive result was determined confirmation testing for LM would be necessary. Based on the recommendation from public comment and codex international approach, GSA recommends changing the testing requirement from <i>Listeria</i> spp. to <i>Listeria monocytogenes</i> in FPT table 2.
Finished Product Testing	Table 2	Action Levels for <i>Listeria</i> spp – Reject if presence is detected in 25gms. Apart from what is mentioned above	Allowance is needed for products with <i>Listeria Monocytogenes</i> less than 100cfu/g in ready to eat seafood that	This is an excellent point, however based on the international audience for the standard, it would be difficult have different action levels for different countries, as well as being a challenge

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Operational Guidance		<p>why is the move to this stated? Many countries outside of the likes of the US and Singapore have Listeria Monocytogenes less than 100cfu/g in ready to eat meats that either do not support the growth of Listeria or have evidence that Listeria will not reach levels greater than 100cfu/g during shelf life.</p> <p>If BAP is global standard, then it needs to reflect this with flexibility to access other options that don't put consumers at risk nor the standard at risk.</p>	either do not support the growth of Listeria or have evidence that Listeria will not reach levels greater than 100cfu/g during shelf life.	<p>for the auditors to know what foodstuffs do not support the growth of Listeria. GSA has no plans to change the standard.</p> <p>A RTE food does not support the growth of L. monocytogenes if the food: Has a pH that is less than or equal to 4.4; or Is customarily held and consumed in a frozen state; or has a water activity that is less than 0.92; or Is processed using an effective listeristatic control measure (e.g., an antimicrobial substance or a combination of factors such as pH, water activity, and antimicrobial substances).</p>
Product Integrity Preservation	PIP2	If we are reading this correctly, then a unique code is needed each time (daily) to carry through production and storage etc. For businesses that are laterally integrated i.e., own their own, hatcheries, farms, and processing site then this would mean additional work and expense for no-benefit? I could understand the need for processing sites buying from different suppliers i.e., hatcheries and farms that may have or not have BAP status.	There needs to be allowance for those businesses which are laterally integrated with BAP stars at each process i.e., hatchery, farm and facility and continue to hold these without interruption to status. In this case the requirement would change to having a process in place to identify how they would manage reduction or change in star with the introduction of a unique code or lot number to manage products for each star.	<p>The SPS team would recommend provide additional clarification – the unique code is based on the star status of each star category, and does not have effect on lot number (Which will change, with each harvest, delivery, production Day).</p> <p>Recommend removing assigning a “lot number” for each Star status from clause PIP2 The unique code is to identify the Star status, the lot code is to identify the production date. The function of these two identifiers are being confused</p>

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Product Integrity Preservation	PIP4	The clause talks about the unique code or lot number shall be transferred to the shipping documents which shall be directly provided to the purchaser/buyer. Is this referring to the buyer of the whole salmon for example from a hatchery or farm to processor (facility) or an end customer i.e., retailer, wholesaler, or consumer. If going to a customer, then they might not want or need this information.	Clarify what is considered a "purchaser/buyer" in this clause so it's clear.	The purchaser/ buyer is related to any transaction in the supply chain before the actual end user of the product (non-retail). All sales from the processor through the supply chain, excluding the consumer would retain the code.
Product Integrity Preservation	PIP8	100% accountability shall be achieved during the exercises. There needs to be some guidance provided around this statement as it means different things to different verifiers and/or producers. Also, product can lose weight over the process and/or gain weight from ingredients.	Provide some guidance to the clause around expectations and considerations.	This guidance is available in the guidance document. If the trace does not account for 100% of the product, the facility shall reconcile the difference citing losses, storage, processing yields, samples shipped, or discarded products.
Ready to Eat	RTE10	In the clause the wording states "Leaves the RTE workstation". This could be interpreted many ways in terms of what a workstation is? i.e., someone could leave the workstation to go to another workstation further the line in the same area where I wouldn't expect them to sanitize as the risk is the same, however if someone left the workstation to another room or another room and returned then I would them to sanitize. This is important as I can see a verifier mis-reading this as commonsense isn't always applied.	Make the intention around this part of the clause clearer so its not misread. i.e... if an operator leaves and room and comes back then then sanitize. For example....	To clarify this statement, we propose removing "RTE workstation and replacing with RTE room"

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Ready to Eat	RTE16	<ul style="list-style-type: none"> High risk zones shall be swabbed at a minimum frequency of weekly. <p>Should the frequency reflect the plan around the process here? Weekly seems excessive based on no knowledge or history apart from plucked from a country standard which can vary from country to country, whereas fortnightly at minimum would be more the middle ground.</p>	Recommend moving on a minimum frequency of fortnightly to reflect midway of standards if a frequency is needed.	SPS team does not recommend increasing the timeframe for swabbing high risk areas to a minimum of fortnightly. This is intended for “high risk” areas. Increasing this timeframe may result in an increased foodborne risk is not detected and increased volumes of contaminated product may be sent to consumers.
Ready to Eat	RTE18	Reading this clause if we are correct, it is indicating an ATP or Residue test shall be done at pre-op? this could then mean the test is done daily and between shifts. Where did the frequency come from to dictate daily or start of shift?	Change the wording in relation to ATP/Residue to “should” rather than “shall” or reduce the frequency so it can be risk managed.	The intent of this clause is to provide immediate feedback to the sanitation team to allow for corrective actions before operations begin. The clause does require ATP or residue testing as well as visual inspection to be conducted at pre-op. This activity would occur at any point there is a changeover /sanitation event for verification. This requirement came from the need to have an objective verification of sanitation. SPS does not recommend changing this clause.
Core	Appeals	The appeals process talks about the process of overturning a certification decision. What about if someone wants to appeal the severity of a non-conformance or a non-conformance.	Make allowance for appeals outside of the certification	SPS proposes to include appealing the non-conformity and/or severity of the non-conformity to the appeal process.
Core	3.2.2	Could this clause also allow for when processed? This would allow for those operators that are vertically integrated to test as required. Although most operators purchase from	Although most operators purchase from growers/farmers some are vertically integrated and therefore might carry out the testing later in the process. Allowance for this would make it easier for those operators, yet still meet the intent.	SPS review proposes that clauses 3.2.2 and 3.21 remove testing at reception and allow facilities to test any point in the process as long as they have a well-documented testing program still meets the intent. It is up to the facility to determine the liability they are willing to assume pending potential non-conforming test results.

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Core	3.9.4	Is the intent around testing for Listeria spp. In drains of RTE facilities only? Adding, testing for Listeria spp. outside of RTE would mean testing programs that would interfere with regularly requirements for some countries where not required and if tested then forms part of the official programme meaning holding and testing of other areas as a result of.	Remove reference of “shall” for Listeria spp. Or make the requirement for RTE facilities and capture under that module as per existing 5.1. issue.	Testing drains for Listeria spp. is intended for non RTE facilities. Swabbing drains for Listeria spp. is a requirement for both non-RTE and RTE. The requirement for non RTE does not include product contact surfaces, holding product is at the discretion of the facility for non-RTE production. The difference in 5.1 was the testing requirement was for listeria monocytogenes, not species which is used as an indicator
Core	3.11.7	What is the driver indicating a frequency of monthly ice quality checks for coliforms. Has there been evidence from reporting this is a problem, therefore set at this frequency?	Consider adopting the water frequency testing for coliforms or risk based or quarterly testing?	Ice and water are only tested 2 times per year for Micro and metals, coliform testing monthly is an interim verification that water and ice have been treated and handled to maintain food safety. The SPS development team would not recommend reducing the frequency.
Core	4.2.2	There needs to be some guidance around what is meant with, “Shall not audit their own areas of operation”. Also, the purpose and intent around this needs to be clear. We’ve found for example our internal auditor is harder on themselves than outside auditors.	Need to understand the rational here, some companies have a number of auditor and swap them out to provide a fresh set of eyes. Guidance is needed and ability to comment on	The Institute of Internal Auditors (IIA) state, that internal auditors shall be independent. The intent is to ensure auditors are not verifying their own work. <u>Institute of Internal Auditors (IAA)</u> .
Core	5.1.1	Precise wording of an “Ethical Trading Policy”. Would it not be easier to state the following is to be covered under a policy/policies? Covering anti-bribery, corruption, extortion, embezzlement etc.	Often business have different names for such policy/policies that also relate better for team members and government auditing bodies. Suggest moving away from a titled policy to coverage in.	The important piece is the content, not the name of the policy. GSA will change 5.1.1: Proposed new wording The facility shall have an Ethical Trading Policy ethical trading policy in place, approved by senior management, to demonstrate the facility's commitment to comply with all applicable national anti-bribery laws and prohibit any act of

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				corruption, extortion, embezzlement, or any form of bribery – either directly or indirectly.
Core	5.7.1	Precise wording of an “Equal opportunity Policy”. Would it not be easier to state the following is to be covered under a policy/policies? Most businesses cover these under different names	Suggest moving away from a specific title and more to coverage of the key purpose and intent under a policy/policies as with 5.1.1 above	<p>The important piece is the content, not the name of the policy.</p> <p>Proposed action GSA will change 5.7.1 wording to:</p> <p>The facility shall have an equal opportunity policy in place that prohibits and shall not engaging in or permitting discrimination in all any aspects of recruitment, employment, and compensation based on legally protected personal characteristics. Terms and conditions of employment shall be based upon the ability to do the job, not on personal characteristics or beliefs.</p>
Core	6.1.7a, 6.1.7b	Just wondering the intent of these, is this just for information gathering? As this is the way its worded. Or are you seeking that these are met? Where the wording would be different i.e., meals shall be provided etc....	As stated, Understanding the intent. What does the answers to the questions mean if anything? If nothing, are they relevant.	<p>These questions are for information/Data gathering</p> <p>No further action but will make sure the auditor is fully aware that this will not be rated as Non Conformity if no information is gathered</p>
Core	6.5.3	The wording of “Where training has to be conducted outside of normal working hours the worker shall be compensated for their time and paid at a premium rate.....” We understand the intent of this, but this doesn’t work in practice for a shift team member brough onto a different shift for training. When this happens the team member is compensated for	I think allowance should be given to other scenarios as mentioned which have also been identified as “fair” for the team member.	<p>GSA will change 6.5.3:</p> <p>Proposed new wording is as follows, if this is agreed we will change the corresponding clauses in ESS as well</p> <p>All training shall be conducted within normal working hours for a worker and at no financial cost to the worker. Where training has to be conducted outside of normal working hours the</p>

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		their time, but time aren't required to complete their usual shift.		worker shall be compensated for their time and paid at a premium rate of pay for any overtime hours as stated in clause 5.2.3.
Ready to Eat	Scope	Need more clarification for this. For example: cooked shrimp, after 70 °C 2 minutes heating. But the cooking instruction show that shrimp need to be cooked before eat it. It is belong to RTE or RTC. Sometimes, some of consume eat it as seafood salad.		The intent of this scope is for ready to eat products, not ready to cook products.
Finished Product Testing	1.1.3	SPS certified facilities (or renewal in process) receiving non-conformities for FDA Refusals (or equivalent) for microbiological pathogens, antimicrobial residues, or histamine.	Could give more details for that? Equivalent, what kind of the non-conformities are considered as equivalent.	SPS proposes adding "under local or federal agency inspection refusals" to encompass all regulatory authorities and not only FDA.
Finished Product Testing	1.1.4	When recall is occur only? Include withdraw or not?		Causes for product recalls are most often associated with released product that has been determined to have food safety, legality, or quality implications, and highly indicative of a potential serious breach in a facility's quality management system. When a recall does occur, GSA issues a potential nonconformance requiring a 3rd party investigation. If the investigation determines that the recall is due to a non-compliance in microbiological pathogens, antimicrobial residues, or histamine GSA considers this a food safety risk due to product contamination and hence the Elevated Risk Status under Annex 1. No change to 1.1.4 is planned.
Finished Product Testing	1.1.5	China is high risk level country. Hope reduce sample frequency if the site test result is satisfied in past one/two years.	Add the requirement to reduce the sample frequency for excellent facility.	Elevated risk status includes new facilities in higher risk regions applying to BAP for the first time. New facilities under elevated risk status are reduced to low risk status and exempt from further testing requirements under FPT provided all parameters test under the BAP limits specified in FPT Tables 2-4:

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				<p>1.1.1 New facilities applying for certification located in regions of high production and antimicrobial use, or in countries with high numbers of US FDA refusals or equivalent regulatory enforcement actions. Specifically, new facilities applying to the GSA Program located in China, Egypt, India, Indonesia, Mexico, Thailand, or Vietnam.</p> <p>Facilities that have successfully passed Finished Product Testing requirements under 1.1 will be moved to Low Risk Status and exempt from product testing during all recertification audits as long as Low Risk Status designation is maintained. No change to 1.1.5 is planned.</p>
Finished Product Testing	2.4.2	If the site have some species, the sample are too much, as we know that a lot of species for wild catch specifies. For example, Hi-Chain sampled cost for SPS about 7000USDs/Year.	Hope use the white fish, red fish etc to reduce the sample quantity. Or based on risk assessment for species.	<p>According to Annex 1- 2.4.2: "Species: If more than 1 species is present within the scope of the audit, the auditor shall select <u>4 samples from 2 different species</u> under consideration of food safety risk factors." Hence, all facilities that require sampling (facilities at elevated risk status) would need to supply 8 samples for each category (8 for aquaculture only, 8 for wild only, 8 for wild + 8 for aquaculture), and tested according to tables FPT1-4. It is noted that this could increase costs for some small aquaculture only facilities under elevated risk status; however, facilities that achieve a low risk status will remain exempt from further testing as long as they remain low risk. No change to 2.4.2 is planned.</p>
Core		There are three instances of "SPS Standard" (Seafood Processing Standard Standard) which is redundant. This occurs on page 7, section "Normative Documents"; page 10, section "Scope of Audit"; and page 15, Clause 2.3.1	"... the SPS Standard" → "... the SPS Standard"	For elevated risk status facilities only, sampling and testing under Annex 1 must be conducted during the certification audit and observed by the auditor. As noted in Annex 1: "GSA recognizes that not all countries/regions may have laboratories with accredited scope to the sensitivity stated in GSA Action Levels. All efforts should be made to locate labs capable of

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				achieving these sensitivity levels (LODs, LORs, LOQs). CBs are asked to contact GSA Program Integrity for consideration where this has not been, or cannot reasonably be, achieved." No change in Annex 1 is planned.
Core	2.11.1	Interject root cause	These shall cover the full scope of the SPS Standard and relevant modules and shall include a root cause analysis that addresses 'why' it happened and how it will prevent future occurrences.	This is addressed in the guidance of this clause
Core	3.1.9	Add customer requirements	... unless the facility can demonstrate, through hazard analysis in its HACCP plan, that it is not reasonably likely to expect metal fragments could enter the food and that metal detection is not required by customers.	
Core	3.9.3	change sequence of protein swabbing	Planned and frequent microbial analyses (ATP or protein residue tests) of food contact areas shall be carried out after cleaning and before sanitizing.	SPS recommends adding "before sanitizing when ever possible"
Core	3.11.1	<p>Clause is self-contradictory: First it states that "Water used in food production areas shall be checked at least every six months by an accredited 3rd party laboratory for microbial and chemical contamination as described in annex 5"</p> <p>Then it states that "At least one of the semi-annual tests shall include both microbiological testing and heavy metals as stated in water & ice testing table 1."</p>	<p>Water used in food production areas shall be checked at least every six months by an accredited 3rd party laboratory for microbial contamination.</p> <p>At least one of the semi-annual tests shall also include heavy metals as stated in water & ice testing table 1."</p>	

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Core	3.14.2 & 3.14.4	These clauses should be combined	All items stored in warehouse areas, including coolers and freezers, shall be stored off floors, away from walls and covered to prevent contamination	SPS agrees combining these clauses and guidance for each of the clauses. Propose combining in 3.14.2 and deleting 3.14.4
Core	5.3.5	This clause is nonsensical. Why have a future employee agree during the hiring process to work overtime, then have no consequences for the employee refusing to work overtime. This clause is detrimental to wild fisheries where gluts of fish require employees to work overtime.	If an employee agrees, as a contingency to employment, to work overtime and then refuses to do so, the employer should have recourse, including terminating the employee.	
Core	5.5.3	What is the definition of "moral integrity?" How is a CB auditor to evaluate this requirement? Likewise, how is "mental and spiritual social development defined?"	This clause should not be in the core. Evaluating such nebulous parameters should be left to the social experts	<p>GSA will change 5.5.3:</p> <p>Proposed new wording-</p> <p>Young workers shall not be subjected to conditions which compromise their health or safety, or moral integrity, or which harms their physical, mental, spiritual, moral or social development. This includes restricting working hours and prohibiting night work and hazardous work.</p> <p>ILO Recommendation 190, Worst Forms of Child Labor Recommendation provides guidance on identify labor that is likely to harm the health, safety, or morals of children:</p> <ul style="list-style-type: none"> ▪ (a) work which exposes children to physical, psychological or sexual abuse;

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				<ul style="list-style-type: none"> ▪ (b) work underground, under water, at dangerous heights or in confined spaces; ▪ (c) work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; ▪ (d) work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; ▪ (e) work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.
Core	3.11.2	Routine water quality checks may not be needed at such high frequency for facilities that do not have farming on site.	Add secondary testing requirements for secondary processing facilities. Or change to risk based frequency requirements	This clause is intended for processing facilities only, the location of the farm site has no influence on the frequency of water testing conducted at the processing facility.

Core/ Module	Clause Number	Comment	Proposed Change	GSA Response
Core	5.3.2	3.2 states "No worker shall work more than 12 hours overtime in any regular working week unless it is voluntary" Clarification this seems to read as before 12 hours overtime doesn't have to be voluntary?	Clarification of this clause all overtime should be voluntary in line with ethical standards.	
Core	5.3.5	This clause doesn't seem to make sense, there should be no detriment or termination for refusal to work any overtime not just if it has been voluntarily agreed too.	Clarification?	
Core	5.4.1	What is a voluntary overtime agreement? If this is something that is signed in advance stating that workers volunteer to work overtime. How does this work at the time overtime is required circumstances change can and will change between signing an agreement and overtime being required?	Clarification in what it is a voluntary Overtime agreement and how does it work?	
Core	5.8	Freedom of Association and Collective Bargaining - Is there any requirement to have some form of worker representation in place or just that they have the right	Clarification is this just a policy statement or a requirement to implement?	
Core	6.2.2	"The facility shall appoint a management person responsible for H&S" Do they need to any knowledge or experience of H&S?	Clarification of management of H&S requirements, Knowledge, experience, qualification?	
Core	2.10.2	Records kept for a minimum of 4 years? That exceeds customer, regulatory and legal requirements. SQF and BRC require shelf life plus a year. Pretty much 3 years.	Records shall be maintained for a time period required to meet customer, regulatory, and legal requirements. At a minimum, for the shelf life of the product plus 12 months.	SPS recommends updating the clause to say: shelf life of the product plus one year and an additional two years if processing LACF stored at a reasonably accessible location.

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Core	3.10.5	Clarify that necklaces are also permitted if there is some sort of medical reason. As written, it looks like medical bracelets and any type of necklace...	Approved jewelry, worn for medical purposes, with management approval, or wedding bands....etc.etc	SPS agrees further clarification is needed, recommend adding "medical" necklace.
Core	3.11.3	Include testing frequency of the backflow prevention devices.	The facility shall prevent water contamination through backflow pressure valves, tested annually, and proper hose storage.	The guidance to be released with this standard will states: Back flow pressure valves shall be installed on water outlets and inspected annually. Hoses shall be stored off the floor and not in contact with non-potable water sources
Core	5.7.9.1	Is there a need to put a time on disciplinary record retention?	Records of investigations with documented outcomes shall be retained in accordance with federal, state, and local laws.	GSA agree with this comment and 5.7.9.1 will change the wording as follows: Records of investigations with documented outcomes including disciplinary actions shall be retained in a confidential manner for a minimum of three years, or as required by national or local law, after which time the records shall be destroyed.
Enhanced Social	Introduction	Introduction states ESS audit will be conducted by experienced, social auditors registered with APSCA. Nearly all audit programs require auditors to be a CSCA auditor registration alone doesn't demonstrate a competence to conduct social audits.	Should this be ESS audit will be conducted by APSCA registered CSCA auditors.	The sentence will be updated: The ESS audit will be conducted by APSCA auditors Proposed new wording APSCA defines a Registered Auditor as a: "Experienced social compliance auditor who is currently going through the CSCA examination process, with a minimum of 1 year experience and 100+ social compliance audit days, or a minimum of 2 years' experience and 50+ social compliance audit days and 100 other type of audit days which include management system, health and safety, labor inspections, investigations, audit

Core/ Module	Clause Number	Comment	Proposed Change	GSA Response
				<p>components. Has signed APSCA's Code of Professional Conduct."</p> <p>APSCA defines a Certified Social Compliance Auditor (CSCA) as an: "Experienced Social Compliance Auditor who has completed the CSCA process. Has signed APSCA's Code of Professional Conduct."</p>
Enhanced Social	2.12	What is meant by the term contractors? Ordinarily we would refer to this as a person or persons attending adhoc to carry work/repairs such a plumber, electrician or engineer and would expect a facility to maintain time records, wages and holiday pay.	Clarification of term Contractor? Possible alternative term used?	<p>GSA will update the clause</p> <p>Proposed new wording</p> <p>The facility shall maintain all relevant documents, including complete and accurate work records and time sheets, that verify all workers, including piece workers and those who are not direct hires contractors and piece workers, are paid in compliance with local or national law, including regulations regarding equivalence to or exceeding minimum requirements regarding wages, overtime, and holiday pay.</p>
Enhanced Social	2.2	We suggest that BAP changes criterion 2.2 to include a living wage requirement.	The facility shall investigate regularly (once a year at least) living wage pay policy for their workers.	<p>The clause will be updated to include a requirement to review the plan at least annually.</p> <p>Proposed New Clause wording</p> <p>The facility shall have a plan, that is reviewed at least annually, to instigate a living wage pay policy for their workers that shall be based on local assessment of the wage requirements to cover the workers' basic expenses and allow for some</p>

Core/ Module	Clause Number	Comment	Proposed Change	GSA Response
				discretionary funds for use by workers and their families.
Enhanced Social	3.2	3.2 states "No worker shall work more than 12 hours overtime in any regular working week unless it is voluntary" Clarification this seems to read as before 12 hours overtime doesn't have to be voluntary?	Clarification of this clause all overtime should be voluntary in line with ethical standards.	Please see 4.1 which states that all work including overtime must be voluntary
Enhanced Social	3.5	This clause doesn't seem to make sense, there should be no detriment or termination for refusal to work any overtime not just if it has been voluntarily agreed too.	Clarification?	This requirement is covered by 4.1, so given that it is confusing GSA propose to remove this clause.
Enhanced Social	4.1	What is a voluntary overtime agreement? If this is something that is signed in advance stating that workers volunteer to work overtime. How does this work at the time overtime is required circumstances change can and will change between signing an agreement and overtime being required?	Clarification in what it is a voluntary Overtime agreement and how does it work?	GSA response- At the time of employment, a worker may agree to overtime. Just as a workers can terminate their contract; they can terminate their overtime agreement. GSA propose to make this clear in the guidance notes and if agreed will do the same for the SPS Core requires that relate to the same topic
Enhanced Social	ESS8	Freedom of Association and Collective Bargaining - Is there any requirement to have some form of worker representation in place or just that they have the right	Clarification is this just a policy statement or a requirement to implement?	GSA response Workers have the right to freedom of association. Facility shall not interfere if workers choose to associate, and they should have a policy stating this fact.
Enhanced Social	10.2	"The facility shall appoint a management person responsible for H&S" Do they need to any knowledge or experience of H&S?	Clarification of management of H&S requirements, Knowledge, experience, qualification?	GSA comment Please see EES Clause 13.1. The facility shall have documented training for workers, based on their specific roles within the company, in areas that include health and safety.

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				All training shall be overseen by a trained competent authority(s). The management person responsible for health and safety should have at least take this training.