

ACCOUNTABILITY IN SEAFOOD SUSTAINABILITY:

Improving the legitimacy of aquaculture certifications through better transparency and stakeholder inclusivity.

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INTRODUCTION

In recent years, seafood certification schemes aimed at assuring farm or fishery conformance with a set of social and/or environmental responsibility criteria have emerged as market-based governance tools for improving sustainability. These certifications are usually voluntary and privately regulated and therefore rely on external parties to buy into them (Tröster and Hiete 2018). That is, the legitimacy of these certifications not only relies on conformance by companies with the set criteria, but also on acceptance by stakeholders affected by the industry that these schemes seek to govern (Marin-Burgos et al. 2015; Vince and Haward 2017).

In simple terms, legitimacy is granted when stakeholders view the actions of a certification scheme as justified and appropriate. Evidence suggests that when legitimacy is granted by civil society, support for the certification scheme and certified companies is generally higher and conflict is lower (Gulbrandsen 2005). This support can result in further pressure on companies to adopt the certification and conform to its requirements (Tröster and Hiete 2018). Where legitimacy is contested, the effectiveness of the scheme has the potential to be compromised as support is likely to be withheld and conflict could arise (Marin-Burgos et al. 2015). It is therefore in a certification's best interest to recognize they are accountable to all external stakeholders, including civil society.

Unlike wild fishery certifications for which the Marine Stewardship Council is the predominant scheme, there are a number of aquaculture certifications in the global seafood marketplace. These include but are not limited to the Aquaculture Stewardship Council (ASC), Best Aquaculture Practices (BAP) and GLOBALG.A.P. These three are commonly cited as meeting major retailers' sustainable seafood procurement policies for farmed seafood. All have achieved recognition by the Global Sustainable Seafood Initiative (GSSI), in part due to their stakeholder engagement processes.¹

Stakeholder consultation is a fundamental component of any legitimate eco-label according to the frameworks that these certifications may adhere to, including the United Nations Food and Agriculture Organisation (UN FAO) Technical

Guidelines on Aquaculture Certification. Additionally, ASC, as the only aquaculture certification to be a full member of the International Social and Environmental Accreditation and Labelling Alliance (ISEAL), also subscribes to ISEAL's codes of practice. Yet, despite stakeholder processes and frameworks and GSSI recognition, there is growing dissatisfaction within non-governmental organizations (NGOs) and local communities that aquaculture certifications are not adequately soliciting stakeholder input and/or addressing civil society stakeholder concerns (SeaChoice 2020). Such dissatisfaction has the potential to threaten the legitimacy of the schemes.

While instilling comprehensive external accountability mechanisms does not guarantee that stakeholder engagement is meaningful, it can increase the likelihood that engagement is more than just a mere box-ticking exercise. The purpose of this SeaChoice review is to understand the extent in which the ASC, BAP and GLOBALG.A.P. are a product of and platform for civil society stakeholder engagement. In particular, we review the external accountability mechanisms that each certification offers for their accessibility and transparency. We conclude by offering recommendations to each aquaculture certification with the intent to foster improvements that enhance and expand their current external accountability offerings to civil society stakeholders and, in turn, maintain or improve legitimacy for their scheme.

¹ It is important to note that the scope of who is considered a stakeholder in GSSI's assessment differed between certifications. Some considered civil society as stakeholders while others did not.

DEFINING EXTERNAL ACCOUNTABILITY

“ [C]ertifications programs and certified producers must recognize that they are answerable to external communities. Failure to do so may result in both material and symbolic losses of goodwill, credibility, and trust from the marketplace and relevant stakeholders. ”

- *Gulbrandsen and Auld 2016*

As advocates for environmental protection and/or social responsibility, civil society stakeholders such as environmental and social NGOs, as well as local communities, can have a significant stake in certification decisions. Environmental and social justice NGOs can provide invaluable expertise and local knowledge to a farm or fishery certification through their input. For example, that “farmed responsibly” salmon in the supermarket case likely had an NGO help establish the sustainability criteria it met, or, perhaps, register objections to its certification.

Fuchs et al. (2009) define external accountability as being “where organizations are held accountable not to those who delegated power to them but to those affected by their decisions.” External accountability requires a certification to be responsive and answerable to stakeholders directly or indirectly affected by the certification’s actions or by operations of the industry that the scheme seeks to certify (Gulbrandsen 2008).

External accountability relies on the transparency of the certification scheme’s processes and outcomes (Auld and Gulbrandsen 2010; Mori Junior et al. 2016; Hachez and Wouters 2011). Without such access to information and data, a stakeholder simply cannot assess a scheme’s credibility in order to grant legitimacy. Therefore, it is presumed that the more transparent a certification scheme is, the more accountable it is to external scrutiny. This external scrutiny is expected to lead to more credibility, which in turn increases the legitimacy the scheme is likely to command (Miller and Bush 2014).

Researchers recognize the importance of two types of transparency: procedural and outcome. Procedural transparency relates to the openness of the scheme’s decision-making and adjudication processes. Outcome transparency relates to the accessibility of information as an outcome of these processes, as well as information on how the scheme is meeting its goals (Fung et al. 2007; Vermeulen 2007).



DEFINING BEST PRACTICE IN EXTERNAL ACCOUNTABILITY

Best practice in external accountability involves ensuring all affected stakeholders are appropriately included in certification scheme processes. Fung (2006) suggests there are three relevant questions that concern stakeholder participation in certification schemes: 1) who gets selected as stakeholder participants; 2) what form of information is exchanged and by what means; and 3) who holds the decision-making power. Instilling a multi-stakeholder balance, particularly within standard-setting and governance representation, enables stakeholders to feel that their views are adequately represented. When stakeholders do not feel involved or represented, it is likely they will disengage from the scheme processes (Gulbrandsen 2005). In addition, decision-making rules should be transparent and preferably achieved through consensus (Mena and Palazzo 2012).

The auditing process – the verification of practices against the standard – should also be open to stakeholder input. Researchers recommend a transparent auditing process that includes making verification audits publicly available, with detailed information on the scope, methodology and compliance evidence (Mori Junior et al. 2016).

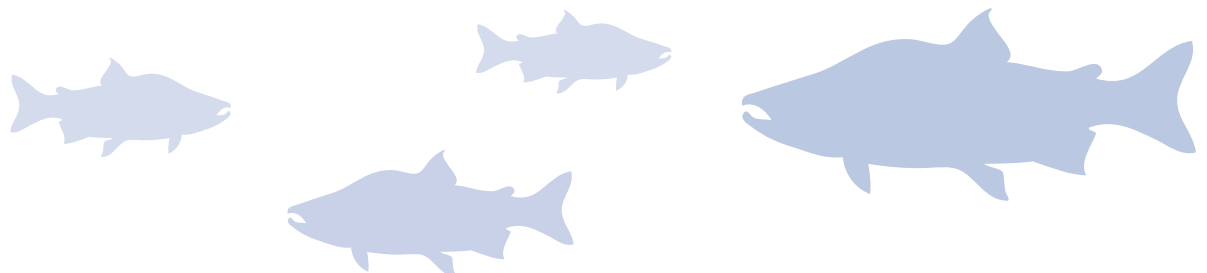
A monitoring and evaluation program is a fundamental instrument for measuring outcomes and demonstrating to stakeholders how the certification is meeting its stated objectives and resulting in sustainability improvements (Mori Junior et al. 2016; Komives and Jackson 2014). Tikina and Innes (2008) suggest that schemes should ultimately evaluate and answer the following question: “has [our] certification scheme eliminated or mitigated the problem?” Transparency on program assurance activities, such as monitoring and disclosure of logo misuse and suspensions, demonstrates to stakeholders that checks and balances are in place to protect the integrity of the certification.

“ Participation and cooperation of stakeholders in developing, monitoring and reviewing schemes is essential to assure the success of any certification scheme with high-quality outputs. ”

- *Mori Junior et al. 2016*

The presence of dispute systems also plays a key role in granting legitimacy as it allows internal stakeholders (i.e., companies) to appeal decisions and external stakeholders to challenge them (Marx 2014). Researchers also stress the importance of dispute systems as an accountability mechanism with which to hold standard holders accountable after a consensus has been reached concerning rules (Bovens 2007; Marx 2014). It is particularly imperative that an impartial grievance mechanism be developed and implemented (Mori Junior et al. 2016).

Researchers agree that external accountability should be integrated within the following five system components that make up certification schemes: standard development, governance, verification, monitoring and dispute settlement (Mori Junior et al. 2016, Marx 2014, Miller and Bush 2014). Box 1 describes the system components and accountability best practices for engaging with external civil society stakeholders.



BOX 1 - EXTERNAL ACCOUNTABILITY BEST PRACTICES FOR CERTIFICATIONS

1 DEVELOPMENT (STANDARD-SETTING):

Civil society stakeholders are represented at a steering committee, roundtable or working group level in standard creation, revision, auditing rules and interpretations (if applicable). Civil society stakeholders are given the opportunity to make public comments, are provided with terms of reference, process outline and necessary consultation documents. Public comments are made available with responses provided on how consideration was given.

2 GOVERNANCE (DECISION-MAKING):

Civil society stakeholders are represented at the governance level. Information on the governance structure, application process, conflict of interest policy and decision-making protocols should be readily available.

3 VERIFICATION (AUDITING):

Civil society stakeholders are consulted during the auditing process, can view audits and compliance certificates and contact the certifying body. Public comments are made available with responses provided on how consideration was given to them.

4 MONITORING (EVALUATION AND PROGRAM ASSURANCE):

A Monitoring and Evaluation (M&E) program that demonstrates to stakeholders that the certification is achieving its theory of change and, ideally, meeting its intended outcomes. Civil society stakeholders are consulted on the M&E program, with stakeholder comments made public with responses provided from the standard holder on how these were considered. Certifying bodies' accreditation is made public. Program assurance activities, including label misuse, are publicly reported.

5 DISPUTE SETTLEMENT (COMPLAINTS):

Fair and independent third-party dispute mechanisms exist for civil society stakeholders to submit objections or complaints regarding the certification, certifier and/or standard holder. The complaint procedure, investigation summary and corrective actions are made public.

Source: adapted from Mori Junior et al. 2016, Marx 2014, Miller and Bush 2014

METHODOLOGY

To evaluate the external accountability each certification offers to civil society stakeholders, we analyzed websites and documentation published by the standard holders from the perspective of an NGO wanting to engage with the scheme. To ensure our scoring was as accurate as possible, we contacted the certifications for clarification if we found the documents outlining their processes and procedures to be unclear. We also contacted them if we couldn't find a particular document on the scheme's website and gave them the opportunity to provide a link to their webpage that held the published document. Only published and publicly available evidence was used. Next, we shared our draft analysis with each standard holder for their review, along with any final clarifying questions we had in order to finalize the analysis.

The basis of our criteria are the five commonly recognized certification system components and best practices in external accountability (described in [box 1](#)). See [Appendix I](#) for the complete methodology and comparative analysis.



SUMMARY OF RESULTS

Each aquaculture certification scheme offers at least some external accountability mechanisms. However, the transparency, accessibility and engagement opportunities for civil society stakeholders vary among the schemes (see Table 1). Full results and supplementary spreadsheets can be downloaded from the SeaChoice website.

It is important to note that our analysis reviewed the opportunities available to stakeholders based on the procedures published or communicated by the certification scheme. It does not review whether these opportunities, when applied in practice, are conducted in a meaningful and effective manner.

Table 1. Review Summary

CERTIFICATION COMPONENTS: EXTERNAL ACCOUNTABILITY

1 Development (standard-setting)

Summary: Civil society stakeholders are represented at the ASC and BAP working groups and/or committees that oversee the development phase of the standard setting process. The GLOBALG.A.P. aquaculture technical committee consists of exclusively industry representatives and incorporates civil society stakeholders in the standard-setting process through direct consultation on specific topics.

All three certifications provide an opportunity for public consultation on standard creation, though whether stakeholder comments and a response from the scheme are made public was found to be inconsistent. ASC and GLOBALG.A.P. provide public consultations on their respective auditing guidelines, while BAP does not. The ASC is distinct in allowing for deviations to its standards, known as variances, which until recently did not include local civil society stakeholder consultation in the approval process.

ASC	BAP	GLOBALG.A.P.
<p>Standard creation and revisions typically involve either a steering committee or technical working group (TWG). For example, the Feed Standard Steering Committee included 10 industry and four non-industry members. The TWG for the Salmon Standard's Parasiticide Treatment Index (PTI) revision included three industry, two academic and two civil society members. Public consultation occurs for standard creation, revisions, auditing guidelines (known as the Certification and Accreditation Requirements) and, as of December 2020, variances to the standards. Public comments from previous consultations are made available; however, whether responses to stakeholder comments are provided was found to be inconsistent (e.g., responses were provided to comments on the Flatfish Standard and the Aligned Standard, but not the Feed Standard or PTI revision).</p> <p>Certifiers can submit variances to the ASC Variance Request Committee on behalf of their client. The Variance Request Committee consists of the ASC CEO, standards director, chair of the Supervisory Board and chair of the Technical Advisory Group (TAG). Variances are made publicly available on the interpretation platform website. Until recently, variance approvals involved no public consultation and no civil society input. In November 2020, the ASC announced a revised variance process that includes consulting with local stakeholders (who have registered with ASC) for standard variances. Variances to the auditing requirements do not include stakeholder consultation.</p>	<p>The Standard Oversight Committee (SOC) is responsible for the primary guidance and oversight of the standard creation and revision process. The SOC consists of four representatives from each of the following: industry, academia and NGOs. Public consultation occurs for standard creation and revisions as per the 2017 BAP Standards Development document. However, prior to this document in 2016, no public comment period was conducted for the Salmon Farm Standard Issue 2 revision. No public consultation period occurs for the auditing guidelines (known as the Requirements for Certification Bodies Offering Certification Against the Criteria of the GAA BAP Standards). When consultation has occurred, public comments along with responses from the SOC are made available.</p> <p>BAP states that it does not implement amendments, variances or interpretations that alter standard or program rule criteria.</p>	<p>The Aquaculture Technical Committee is responsible for improvements and maintenance of the standards, as well as participation within the development process for new or revised standards. The committee consists of six retail or food-service members and six producer or supplier members. No civil society stakeholders are represented on the committee. Instead, civil society stakeholders may be invited to focus groups, technical meetings or targeted consultations. Public consultation occurs for standard creation, revisions and auditing guidelines (known as the General Regulations). Public comments from previous consultations could not be found; however, comments and explanations have been provided for the Aquaculture Standard revision under the Integrated Farm Assurance Standard v6 second consultation (currently in progress). Tracked changes between standard versions are also available.</p> <p>GLOBALG.A.P. states that it does not implement amendments, variances or interpretations that alter standard or program rule criteria. There are National Interpretations Guidelines (NIG) where necessary. A NIG is a document for certification bodies that provides country-level guidance on how to implement and audit against the standard at a national level. It does not change the standard's control points or compliance criteria.</p>

2 Governance (decision-making)

Summary: NGOs have representative seats, alongside industry, on the ASC Supervisory Board and BAP Standards Oversight Committee. Only industry stakeholders have representation on the GLOBALG.A.P. board. All publish the current board members, eligibility criteria, decision-making process and annual reports. Meeting notes are typically not published.

ASC	BAP	GLOBALG.A.P.
<p>The Supervisory Board consists of four industry and four non-industry representatives (three of which are NGOs). The Technical Advisory Group consists of two industry, two NGO and eight academic members. Current board and TAG members, eligibility criteria, annual reports and decision-making protocols are made public. TAG meeting notes up until 2016 are made available, but post-2016 are not (ASC states that these will be made available soon). Supervisory Board meeting notes are not available, despite ASC's Executive Board Regulations stating these are to be posted on the ASC website.</p> <p>ASC states a conflict of interest policy for the TAG has been recently approved but is yet to be published. The ASC also states they intend to develop a conflict of interest policy for the SB.</p>	<p>The SOC consists of four industry, four academic and four conservation/social justice NGO members. Current SOC members, recruitment process and decision-making protocols are made public. Annual reports and meeting notes are not published; however, they are available on request.</p> <p>BAP states that performance reviews of the SOC are conducted internally.</p>	<p>The GLOBALG.A.P. board consists of seven retailer or food-service and seven producer or supplier representatives. Of the supplier seats, one seat is for each scope (i.e., one supplier seat for aquaculture). No civil society stakeholders are represented. Current board members, eligibility criteria, annual reports and decision-making protocols are made public. However, meeting notes and performance reviews are not.</p>

3 Verification (auditing)

Summary: Local civil society stakeholders are invited to provide input during the ASC certification auditing process, but not the auditing processes of the BAP or GLOBALG.A.P. All schemes provide a list of certified farms; however, only the ASC publishes audit reports. ASC and GLOBALG.A.P. publish farm certificates and the corresponding certifying body. The BAP certification instead publishes a BAP number; contact details for the corresponding certifying body are not published.

ASC	BAP	GLOBALG.A.P.
<p>Information on the audit process, a searchable database of certified farms, certificate and contact information for the certifying body are publicly available. Farms that are in assessment, suspended or withdrawn can also be found by searching the "certification status" within the farm database.</p> <p>Stakeholders are notified by the certifying body of upcoming audits where they can provide input. Audit (initial, surveillance and recertification) announcements are also made available on the database. Stakeholders can request that the ASC automatically notify them of any audits, reports and changes to the database applicable to their interest/region. A 15-working-day public consultation is conducted for initial and recertification draft audit reports. The certifying body is required to consider and respond to stakeholder input before certification is granted. The audit template includes a section for stakeholder submissions and response. Final audit reports are made publicly available with conformance evidence.</p>	<p>Information on the audit process, a list of certified and in-assessment (new and renewals) farms are publicly available. Certificates are not made available; instead, a BAP number is listed. The certifying body for the certified farm is not made available. To obtain the certifier's contact, stakeholders need to obtain the certificate directly from BAP or the certified facility.</p> <p>No public consultation with stakeholders is conducted during the auditing process, nor are audit reports or summaries published. BAP states that this is for reasons of confidentiality. Auditors may, at their discretion, select individuals for an interview during the auditing process, though it is not required. Requests to access audit reports can be made; however, the producer's permission is required for the full report to be shared. In the absence of the producer's permission, the certifying body can share a summary report on request.</p>	<p>Information on the audit process, a list of certified farms, certificate and contact information for the certifying body are publicly available. No public consultation is conducted during the auditing process, nor are audit reports or summaries published. GLOBALG.A.P. states that this is for reasons of confidentiality. If requested, access to audit reports can be shared on the explicit permission of all participants involved.</p>

4 Monitoring (evaluation and program assurance)

Summary: BAP and GLOBALG.A.P. are yet to develop a theory of change. Neither currently has a monitoring and evaluation (M&E) program. Since inception, ASC has had a theory of change and in August 2020 released a M&E report. All certifications have published auditor accreditation processes and label use rules. ASC publishes certificate and logo licensing agreement suspensions.

ASC	BAP	GLOBALG.A.P.
<p>ASC's theory of change has been in place since its inception. In 2017 it initiated its M&E program. This included a 30-day public consultation. The ASC released its M&E report in August 2020.</p> <p>An outline of the auditor accreditation process is available. ASC's accreditation provider, Assurance Services International (ASI), provides a list of approved auditors and a summary of accreditation details, including suspensions. Public rules for label use are available. Farms and/or companies that have had their certificate or logo licensing agreement suspended are publicly listed on the ASC website.</p>	<p>There is no M&E program. BAP states that it is in the process of developing a theory of change.</p> <p>An outline of the auditor accreditation process and the accreditation status of auditors is public; however, accreditation reports are not. Public rules for label use are available. Label breaches are not released publicly.</p>	<p>There is currently no defined theory of change or M&E program that assesses the impacts of the standard against intended outcomes.</p> <p>An outline of the auditor accreditation process, as well as certifying body performance ratings and breaches, are published on the website. Public rules for label use are available. Label breaches are not published; however, GLOBALG.A.P.'s Brand Integrity Program publicly reports on the number of misuses per year.</p>

5 Dispute settlement (complaints)

Summary: All three certifications have published dispute settlement procedures regarding certificate, certifying body and standard-holder complaints. However, all certifications lack a third-party complaint procedure that ensures the process is fair and independent (except for Assurance Services International's complaint investigations into ASC-accredited certifying bodies). In particular, we found that stakeholders are expected to submit complaints regarding certifications directly to the certifying body that awarded the certificate. The certifying body then conducts an internal investigation. For disputes regarding the certification standard holder itself, the three certifications state that the complaint is internally investigated. We note that the ASC allows for the possibility, but falls short of requiring, that an independent investigator or third complaint panel member be included in its internal investigation.

ASC	BAP	GLOBALG.A.P.
<p>Complaint procedures regarding certificate and standard holder disputes are available, along with a contact. Complaints regarding a farm certification are dealt with by the certifying body. Complaints regarding the certifying body (known as the Conformity Assessment Body or CAB) are investigated by ASC's accreditation provider, Assurance Services International. Complaint investigation summary reports are made publicly available on the ASI website and include any corrective actions taken against the certifying body.</p> <p>In the case of standard-holder disputes, the complaint is investigated by a complaint panel, which consists of an investigator (who may be an ASC operational employee, an ASC governance or working group member or an external expert), the ASC ombudsman (from the ASC Supervisory Board) and, depending on the nature of the complaint, a member independent of the ASC. Therefore, the process does not clearly stipulate the requirement for an independent third-party dispute resolution mechanism. However, some impartiality by way of an independent investigator or independent third member may be introduced if the ASC deems it necessary.</p> <p>The ASC states that no complaint has been submitted formally through the process to date. The Executive Board Regulations state, "disputes, their status, and resolution" would be posted on the ASC website.</p>	<p>Complaint procedures regarding certificate and standard-holder disputes are available. A BAP contact is provided for standard-holder complaints. Certificate complaints require plaintiffs to submit their disputes directly to the certifying body. However, as described above, BAP does not publish who the certifying body is for each certified facility. Therefore, to submit a complaint regarding a BAP facility would require obtaining the certificate from BAP or the certified facility.</p> <p>The certification complaint procedure lacks an independent third-party mechanism, as it is the certification body that investigates the complaint. In the case of standard-holder disputes, the complaint is investigated internally between the BAP Program Integrity Manager and the plaintiff. There is no public reporting on complaint investigations. Corrective actions such as withdrawal of producer certificates are not made public.</p>	<p>Complaint procedures regarding certificate and standard-holder disputes are available, along with a contact. The certification complaint procedure lacks an independent third-party mechanism as the certification body investigates the complaint. Traceability checks may involve an independent expert. In the case of standard-holder disputes, the complaint is investigated internally between the GLOBALG.A.P. secretariat and the plaintiff. Corrective actions are not made public. The number of complaints per year by crop (i.e., commodity) and country are publicly reported but investigation summaries are not.</p>

CONCLUSION

Our review of the external accountability mechanisms offered by the three largest aquaculture eco-certifications in the global seafood marketplace shows that, while the transparency, accessibility and stakeholder engagement opportunities vary among the schemes, each certification has room for improvement in ensuring that its scheme is a product of and platform for civil society stakeholder engagement. While incorporating comprehensive external accountability mechanisms does not guarantee that stakeholder engagement is meaningful, it can increase the likelihood that engagement is more than just a mere box-ticking exercise. In fact, adopting improvements will likely help establish, maintain and even further the certifications' legitimacy with civil society stakeholders. Not doing so leaves the certifications vulnerable to stakeholder criticism and support withdrawal.

Each certification has been provided with specific recommendations based on our analysis. These scheme-specific recommendations and their responses can be found on the SeaChoice website. However, overall, we recommend that certifications establish and/or strengthen the following:

RECOMMENDATION 1

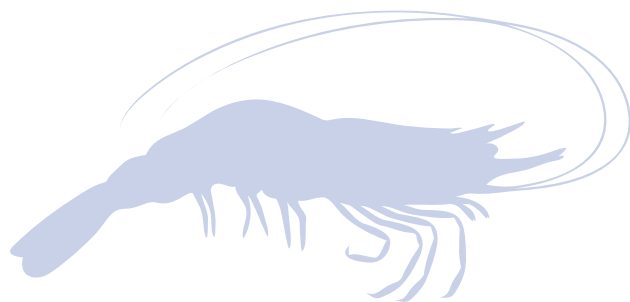
(Applicable to GlobalG.A.P.): Establish civil society as stakeholders on standard-development committees and governance bodies.

Enhancing multi-stakeholder representation on committees will help ensure civil society stakeholder viewpoints are adequately represented and considered. Including NGOs at the governance level would help combat perceptions that industry stakeholders are playing the role of “the fox guarding the henhouse.”

RECOMMENDATION 2

(Applicable to ASC, BAP and GlobalG.A.P.): Strengthen stakeholder consultation on all relevant standard changes and auditing guidelines; and ensure responses are provided to stakeholders and published.

Stakeholders should be consulted in the formulation of certification standards, and also in any revisions, deviations (e.g., variances) or development of auditor guidelines. Publishing and providing responses to stakeholders on how their input was considered would help improve transparency and accountability in the decision-making process.



RECOMMENDATION 3

(Applicable to: BAP and GlobalG.A.P.): Establish processes that will ensure civil society stakeholders are consulted during audits and publish audit reports.

Including civil society stakeholders in the auditing process contributes important local expertise and knowledge, as well as providing stakeholders with the potential to directly influence farm practices and have their concerns addressed. Providing transparency on audit reports demonstrates to stakeholders how farms are conforming to the standard. The confidentiality requirements outlined in the ISO/IEC 17065 standard provide the flexibility to establish expectations that audit information will be published, as per 4.5.1: “The certification body shall inform the client, in advance, of the information it intends to place in the public domain.”

RECOMMENDATION 4

(Applicable to: BAP and GlobalG.A.P.): Establish a monitoring and evaluation (M&E) program.

A successful M&E program can demonstrate to all stakeholders the environmental and social impacts that the certification scheme is having and assess their efficacy against a theory of change. The program should be developed in consultation with stakeholders.

RECOMMENDATION 5

(Applicable to: ASC, BAP and GlobalG.A.P.): Strengthen dispute-settlement processes by adopting independent third-party mechanisms.

Stakeholders should be able to submit complaints that are investigated through a fair and independent third-party mechanism to ensure any potential conflict of interest is removed.

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APPENDIX I. COMPARATIVE ANALYSIS BY STANDARD HOLDER

METHODOLOGY

The certification components were categorized into prospective accountability and retrospective accountability (Marx 2014). The former refers to the creation and verification processes of the certification system (1-3) and the latter being the system processes post-certification (4-5). Each component criterion was further assessed for “procedural transparency” (e.g., the openness of processes) and “outcome transparency” (e.g., accessibility of information as an outcome of these processes). Information was collated for each criterion within a spreadsheet. Based on this collated information, we allocated a “Present” (Yes) or “Absent” (No) mark for each criterion. In circumstances where the criterion was “Somewhat” (Partial) met, this was allocated as such. Full results and supplementary spreadsheets for each certification can be downloaded from the SeaChoice website.

CERTIFICATION SYSTEM COMPONENTS	ASC	BAP	GLOBALG.A.P.
PROSPECTIVE ACCOUNTABILITY			
1. Development (standard-setting)			
1.1 Standard creation			
<i>NB: To ensure this review reflects the recent efforts of the standard-holder, the most recently completed standard created was used</i>			
Procedural transparency			
Civil society stakeholder representation in standard development (e.g., steering committee, roundtables, working groups, etc.)	YES	YES	NO
Public standard development process document for new standards	YES	YES	YES
Public terms of reference and outline of process	YES	PARTIAL	PARTIAL
Public comment period(s)	YES	YES	YES
Publicly available consultation documentation (e.g., provides a rationale for proposed, as well as any relevant data and studies)	YES	NO	YES
Outcome transparency			
Public standard	TBD ²	YES	YES
Public documentation of received comments	YES	YES	NO
Public documentation of the response to comments received, or of the consideration given to comments received	NO	YES	NO

² To be determined as this process is yet to occur (e.g., no formal complaint to standard holder has yet occurred) or the outcome is yet to be published, but expected (e.g., the final feed standard).

CERTIFICATION SYSTEM COMPONENTS	ASC	BAP	GLOBALG.A.P.
1.2 Standard revisions			
<i>NB: To ensure this review reflects the recent efforts of the standard-holder, the most recently completed salmon (ASC and BAP) or aquaculture (GlobalG.A.P.) standard revision was used</i>			
Procedural transparency			
Civil society stakeholder representation in revision development (e.g., steering committee, roundtables, working groups, etc.)	YES	YES	NO
Public information on how revisions are triggered (e.g., scheduled vs. responsive)	YES	YES	NO
Public timeline of current and upcoming revisions	YES	YES	YES
Public terms of reference including timeline, revision goals, outline of stakeholder opportunities, decision-making process	YES	PARTIAL	PARTIAL
Public comment period(s)	YES	NO	YES
Publicly available consultation documentation (e.g., provides a rationale for proposed, as well as any relevant data and studies)	YES	NO	NO
Outcome transparency			
Public revised standard	YES	YES	YES
Public documentation of received comments	YES	NO	PARTIAL
Public documentation of the response to comments received, or of the consideration given to comments received	NO	NO	PARTIAL
1.3 Interpretations / variances			
Procedural transparency			
Civil society stakeholder representation in interpretation development (e.g., steering committee, roundtables, working groups, etc.)	YES	NA ³	NA
Public outline of process	YES	NA	NA
Public comment period(s)	YES	NA	NA
Publicly available consultation documentation (e.g., provides a rationale for proposed, as well as any relevant data and studies)	YES	NA	NA
Outcome transparency			
Public interpretations / variances	YES	NA	NA
Public documentation of received comments	TBD	NA	NA
Public documentation of the response to comments received, or of the consideration given to comments received	TBD	NA	NA
1.4 Program rules (e.g., auditing, non-compliance, suspension, etc.)			
Procedural transparency			
Civil society stakeholder representation in program rules development (e.g., steering committee, roundtables, working groups, etc.)	YES	YES	NO
Public outline of process	YES	NO	YES
Public comment period(s)	YES	NO	YES
Publicly available consultation documentation (e.g., provides a rationale for proposed, as well as any relevant data and studies)	YES	NO	YES
Outcome transparency			
Public program rules	YES	YES	YES
Public documentation of received comments	YES	NO	NO
Public documentation of the response to comments received, or of the consideration given to comments received	NO	NO	NO

3 Not applicable as the standard-holder does not conduct this process.

CERTIFICATION SYSTEM COMPONENTS	ASC	BAP	GLOBALG.A.P.
2. Governance (decision-making)			
2.1 Governance structure			
Procedural transparency			
Public information on structure	YES	YES	YES
Public outline of nomination and selection process.	YES	YES	YES
Published conflict of interest policy; published annual report on application of conflict of interest policy	PARTIAL	NO	YES
Public outline of decision-making protocols	YES	YES	YES
Publicly available contact information for unsolicited input	PARTIAL	YES	PARTIAL
Outcome transparency			
Inclusive NGO/civil society representation	YES	YES	NO
Publicly available meeting notes	PARTIAL	NO	NO
Publicly available performance review of governance body	NO	NO	NO
3. Verification (auditing)			
3.1 Farm audits			
Procedural transparency			
Public information on auditing process	YES	YES	YES
Stakeholder notification and invitation to consult on audits	YES	NO	NO
Public reporting of upcoming audits	YES	YES	NO
Publicly available draft audit reports	YES	NO	NO
Public comment period(s)	YES	NO	NO
Public draft audits provide conformance evidence	YES	NO	NO
Publicly available contact information of certifying body	YES	NO	YES
Outcome transparency			
Public list of certified farms	YES	YES	YES
Public list of suspended, withdrawn farms	YES	NO	NO
Public list of farms in assessment	YES	YES	NO
Publicly available certificates	YES	NO	YES
Publicly available finalized audits	YES	NO	NO
Public final audits provide conformance evidence	YES	NO	NO
Public documentation of received comments	YES	NO	NO
Public documentation of the response to comments received, or of the consideration given to comments received	YES	NO	NO

CERTIFICATION SYSTEM COMPONENTS	ASC	BAP	GLOBALG.A.P.
RETROSPECTIVE ACCOUNTABILITY			
4. Monitoring (M&E)			
4.1 Monitoring and Evaluation			
Procedural transparency			
Public theory of change available	YES	NO	NO
Public terms of reference and outline of process	YES	NO	NO
Public comment period(s)	YES	NO	NO
Publicly available consultation documentation (e.g., provides a rationale for proposed, as well as any relevant data and studies)	YES	NO	NO
Outcome transparency			
Public M&E results	YES	NO	NO
Public documentation of received comments	YES	NO	NO
Public documentation of the response to comments received, or of the consideration given to comments received	PARTIAL	NO	NO
4.2 Program assurance			
Procedural transparency			
Public outline of auditor accreditation process	YES	YES	YES
Public rules for label use	YES	YES	YES
Outcome transparency			
Public list of approved auditors	YES	YES	YES
Public accreditation reports of auditors	YES	NO	YES
Public list of breaches of label use	YES	NO	NO
5. Dispute settlement			
5.1 Certification process disputes			
Procedural transparency			
Public outline of certification objection procedure	YES	YES	YES
Publicly available contact for objections to certifications	YES	NO	YES
Outcome transparency			
Procedurally fair independent third-party dispute-resolution mechanism	YES	NO	NO
Public reporting of complaints investigation and resolution	YES	NO	NO
Public evidence of corrective actions (e.g., auditor NCs, withdrawing cert.)	YES	NO	PARTIAL
5.2 Standard holder disputes			
Procedural transparency			
Public outline of complaint procedure	YES	YES	YES
Publicly available contact for complaints regarding standard holder	YES	YES	YES
Outcome transparency			
Procedurally fair independent third-party dispute-resolution mechanism	PARTIAL	NO	NO
Public reporting of complaints investigation and resolution	TBD	NO	NO
Public evidence of corrective actions (e.g., auditor NCs, withdrawing cert.)	TBD	NO	NO



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