

## Form 3 - Public Disclosure Form

*This form shall be submitted by the CAB no less than thirty (30) working days prior to any onsite audit. Any changes to this information shall be submitted to the ASC within five (5) days of the change and not later than 10 days before the planned audit. If later, a new announcement is submitted and another 30 days rule will apply.*

*The information on this form shall be public and should be posted on the ASC website within three (3) days of submission (except unannounced audits).*

*This form shall be written to be readable to the stakeholders and other interested parties.*

*This form should be translated into local languages when appropriate*

### PDF 1 Public Disclosure Form

#### PDF 1.1 Name of CAB

Acoura Marine Ltd. t/a Lloyd's Register

#### PDF 1.2 Date of Submission

04/05/2020

#### PDF 1.3 CAB Contact Person

PDF 1.3.1 Name of Contact Person Charlotte Middleton

PDF 1.3.2 Position in the CAB's-organisation Aquaculture Scheme Coordinator (ASC Farm Scheme)

PDF 1.3.3 Mailing address 6 Redheughs Rigg, Edinburgh, EH12 9DQ

PDF 1.3.4 Email address [asc-ca@lr.org](mailto:asc-ca@lr.org)

PDF 1.3.5 Phone number (+44) (0)131 357 3294

PDF 1.3.6 Other N/A

#### PDF 1.4 ASC Name of Client

PDF 1.4.1 Name of the Client KILIC DENIZ URUNLERI URETIM IHR. ITH. TIC. A.S.

PDF 1.4.1.a Name of the unit of certification Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi

PDF 1.4.2 Name of Contact Person	Engin Mola
PDF 1.4.3 Position in the client's organisation	Quality Systems Manager
PDF 1.4.4 Mailing address	Milas Bodrum Karayolu 18. KM Kemikler Koyu Mevkii Milas Mugla
PDF 1.4.5 Email address	<a href="mailto:enginmola@kilicdeniz.com.tr">enginmola@kilicdeniz.com.tr</a>
PDF 1.4.6 Phone number	N/A
PDF 1.4.7 Other	N/A

**PDF 1.5 Unit of Certification**

PDF 1.5.1 Single Site	Yes
PDF 1.5.2 Multi-site	No
PDF 1.5.2.a Ownership status	Owned
PDF 1.5.3 Group certification	No

**PDF 1.6 Sites to be audited**

Site Name	GPS Coordinates	List all species per site and indicate if they are in the scope of the standard	Ownership status (owned/ subcontracted)	Date of planned audit and type of audit (Initial, SA1, SA2, recertification, etc.)	Status (new, in production/ following /in harvest)
Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi	37.188601, 27.511146	European Seabass (Dicentrarchus labrax) and Gilthead Seabream (Sparus aurata), yes within scope	Owned	07 - 08/09/2020, SA1	In production

**PDF 1.7 Species and Standards**

Standard	Species (scientific name) produced	Included in scope (Yes/No)	ASC endorsed standard to be used	Version Number
Abalone 1.1				

Bivalve 1.1			
Freshwater Trout 1.0			
Pangasius 1.1			
Salmon 1.2			
Shrimp 1.1			
Tilapia 1.2			
Seriola/Cobia 1.1			
Seabass/ bream and meagre v. 1.1	European Seabass (Dicentrarchus labrax) and Gilthead Seabream (Sparus aurata)	Yes	ASC Seabass, Seabream v1.1. and Meagre

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

Name/organisation	Relevance for this audit	How to involve this stakeholder (in-person/phone interview/input submission)	When stakeholder may be contacted	How this stakeholder will be contacted
Aquaculture Stewardship Council	Scheme Owner	Quality checks	Following public disclosure and publication of surveillance report	Email
Local Agriculture Governance	Local governance	Input submission	Following public disclosure and publication of surveillance report	Email
Village leader	Local village	Input submission	Following public disclosure and publication of surveillance report	Local representative to contact
Mugla Cultural Fishermen Association	Industry	Input submission	Following public disclosure and publication of surveillance report	Email
Noordzee	Industry	Input submission	Following public disclosure and publication of surveillance report	Email

**PDF 1.9 Proposed Timeline**

PDF 1.9.1

Contract Signed:

Apr-20

PDF 1.9.2

Start of audit:

Preparations commenced May 2020

PDF 1.9.3

Onsite Audit(s):

07 - 08/09/20

PDF 1.9.4

Determination/ Decision:

Due October 2020

**PDF 1.10 Audit Team**

PDF 1.10.1

PDF 1.10.2

PDF 1.10.3

Column1	Name	ASC Registration
Lead Auditor	Francisco Padilla	
Technical Experts	Tulay Varoglu	
Social Auditor	Leon Reed	

## ASC Audit Report - Opening

### General Requirements

- C1** Audit reports shall be written in English and in the most common language spoken in the areas where the operation is located.
- C2** Audit reports may contain confidential annexes for commercially sensitive information.
- C2.1** The CAB shall agree the content of any commercially sensitive information with the applicant, which can still be accessible by the ASC and the appointed accreditation body upon request as stipulated in the certification contract.
- C2.2** The public report shall contain a clear overview of the items which are in the confidential annexes.
- C2.3** Except for the annexes that contain commercially sensitive information all audit reports will be public.
- C3** The CAB is solely responsible for the content of all reports, including the content of any confidential annexes.
- C4 Reporting Deadlines for certification and re-certification audit reports (in working day)**
- C4.1** Within thirty (30) days of the completing of the audit the CAB shall submit a draft report in English and the national or most common language spoken in the area where the operation is located.
- C4.2** Within five (5) days the ASC should post the draft report to the ASC website.
- C4.3** The CAB shall allow stakeholders and interested parties to comment on the report for fifteen (15) days.
- C4.4** Within twenty (20) days of the close of comments, the CAB shall submit the final report to the ASC in English and the national or most common language spoken in the area where the operation is located.
- C4.5** Within five (5) days the ASC should post the final report to the ASC website.
- C4.6** Audit reports shall contain accurate and reproducible results.
- C5 Reporting Deadlines\* for surveillance audit reports**
- C5.1** Within ninety (90) days of the completing of the audit the CAB shall submit a final report in English and the national or most common language spoken in the area where the operation is located.
- C5.2** Within five (5) days the ASC should post the final report to the ASC website.
- C5.3** Audit reports shall contain accurate and reproducible results.

### 1 Title Page

1.1 Name of Applicant	Kılıç Deniz Ürünleri Üretim İth. İhr Tic. A.Ş Kilic Orfoz Deniz Balıkları Yetistirciligi Projesi
1.2 Report Title [e.g. Public Draft Certification Report/ Final certification report/Surveillance report]	Public Surveillance Report
1.3 CAB name	Acoura Marine Ltd. t/a Lloyd's Register
1.4 Name of Lead Auditor	Francisco Padilla
1.5 Names and positions of report authors and reviewers	Francisco Padilla (Lead Auditor) Leon Reed and James Brooks (Social auditor), Technical expert: Tulay Sahin Technical Reviewer: Paul Macintyre
1.6 Client's Contact person: Name and Title	Engin Mola
1.7 Date	19/01/2021

### 2 Table of Contents

Public Disclosure Form  
 Section 1: Title Page  
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 Section 8: Audit Plan  
 Audit Report  
 Summary of Findings  
 Traceability  
 Audit Report Closing

### 3 Glossary

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

Trix index: risk of eutrophication index used in Turkey to define benthic health status in farms.  
 EIA: Environmental Impact assessment.  
 AZE: Allowable Zone of Effect.  
 ADD: Acoustic Deterrent Devices.  
 GGAP: Global Gap Certification  
 BAP: Best Aquaculture Practices Certification.  
 GMO: Genetical modified Organism  
 GHG: Greenhouse Gas.

### 4 Summary

A concise summary of the report and findings. The summary shall be written to be readable to the stakeholders and other interested parties.

4.1 A brief description of the scope of the audit ( <i>including activities of the UoC being audited</i> )	The scope of the audit is all sea bass and sea bream farming activities of the company Kilic at the site Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi										
4.2 A brief description of the operations of the unit of certification	On-growing bass and bream farm in sited in the Adriatic Sea, in coast of Turkey. Total area of the concession is 80,000 m2, with a total 18 cages of 50-meter diameter and a maximum depth of 33 meters. The site is mainly dedicated to produce sea bream actually but producing sea bass is also a possibility. Final harvest size for both species is 300 to 350 gr; with on growing periods ranging from 12 months to 16 depending on the season and specie. Actual approved production is 1780 of bass and bream. There is a barge for feeding support and all cages are deployed in the same grid. The unit of certification includes harvest and transport to the processing plant.										
4.3 Type of unit of certification ( <i>select only one type of unit of certification in the list</i> )	Single farm										
4.4 Type of audit ( <i>select all the types of audit that apply in the list</i> )	Surveillance 1										
4.4.1 Number of sites included in the unit of certification Initial audit - 06/2019 Surveillance audit 1 - 06/ 2020 Surveillance audit 2 - mm/ yyyy Recertification audit - mm/ yyyy	<table border="1"> <thead> <tr> <th data-bbox="597 1501 852 1528">Owned by client</th> <th data-bbox="852 1501 1169 1528">Subcontracted by client</th> </tr> </thead> <tbody> <tr> <td data-bbox="597 1528 852 1556">1</td> <td data-bbox="852 1528 1169 1556">N/A</td> </tr> <tr> <td data-bbox="597 1556 852 1583">1</td> <td data-bbox="852 1556 1169 1583">N/A</td> </tr> <tr> <td data-bbox="597 1583 852 1610">N/A</td> <td data-bbox="852 1583 1169 1610">N/A</td> </tr> <tr> <td data-bbox="597 1610 852 1638">N/A</td> <td data-bbox="852 1610 1169 1638">N/A</td> </tr> </tbody> </table>	Owned by client	Subcontracted by client	1	N/A	1	N/A	N/A	N/A	N/A	N/A
Owned by client	Subcontracted by client										
1	N/A										
1	N/A										
N/A	N/A										
N/A	N/A										
4.5 A summary of the major findings	See summary page in this report.										

4.6 The Audit determination

The ASC Seabass, Seabream and Meagre 1st surveillance audit report for the Kilic - Orfoz Deniz Baliklari Yetistiriciligi Projesi farm has been reviewed and deemed satisfactory in content and presentation. The audit originally commenced remotely but converted to onsite when it was clear that IT difficulties prevented the collection of sufficient evidence. The farm UoC has been clarified to include the harvest operation and transport to the Kilic Bodrum processing plant, and this is where the CoC commences. The Root Cause Analysis and Corrective Action provided by the farmer for the four major and six minor NCs were assessed and the reviewer concurs with the audit team that all but one may be closed. The open NC at 2.1.2 relates to the sampling methodology used by the contracted laboratory and the accuracy of results expressed, and the reviewer agrees this minor NC can remain open pending the next round of sampling, the results to be presented at the 2nd surveillance. Consequently, Acoura Marine Ltd. t/a Lloyd's Register confirm ongoing ASC Seabass, Seabream and Meagre v1.1 single site certification for the Kilic - Orfoz Deniz Baliklari Yetistiriciligi Projesi farm.

5 CAB Contact Information

5.1 CAB Name

Acoura Marine Ltd. t/a Lloyd's Register

5.2 CAB Mailing Address

6 Redheughs Rigg, South Gyle, Edinburgh, EH12 9DQ

5.3 Email Address

[asc-ca@lr.org](mailto:asc-ca@lr.org)

5.4 Other Contact Information

(+44) (0)131 357 6620

6 Background on the Applicant

6.1 Information on the Public Disclosure Form (Form 3) except 1.2-1.3. All information updated as necessary to reflect the audit as conducted.

Please see Public Disclosure form above.

6.2 A description of the unit of certification (*for initial audit*) / changes, if any (*for surveillance and recertification audits*)

The unit of certification includes the Orfoz on-growing bass and bream farm which includes a total 18 cages of 50-meter diameter and a maximum depth of 33 meters, and several occasional juvenile and harvest cages from 2 to 3 of each one used for support. The site is mainly dedicated to produce sea bream actually but producing sea bass is also a possibility. There is a barge for feeding support and all cages are deployed in the same grid. The scope of the audit also includes land base support facilities, hatcheries and feed mills according to standard requirements. The unit of certification includes harvest and transport to the processing plant.

6.3 Other certifications currently held by the unit of certification

GGAP, ISO9001, ISO22000, ISO 14000.

6.4 Other certification(s) obtained by the UoC before this audit

None, see above.

6.5 Estimated annual production volumes of the unit of certification of the current year

Actual production approximate production for the ongoing calendar year is 1500 tons

6.6 Actual annual production volumes of the unit of certification of the previous year (*mandatory for surveillance and recertification audits*)

Last calendar year production was 1900 tons.

6.7 Production system(s) employed within the unit of certification (*select one or more in the list*)

Cages

- 6.8** Number of employees working at the unit of certification (*see notes in comment to this cell*)
- 6.9** Size, and/or number of ponds, pens (if multi site, per site)

In total 5 employees.

18 cages of 50 meter diameter each, with around 33000 cubic meter of volume per cage.

## 7 Scope

- 7.1** The Standard(s) against which the audit was conducted, including version number
- 7.2** The species produced at the applicant farm (*in English and Latin names*)
- 7.3** A description of the scope of the audit including a description of whether the unit of certification covers all production or harvest areas (i.e. ponds) managed by the operation or located at the included sites, or whether only a sub-set of these are included in the unit of certification. If only a sub-set of production or harvest areas are included in the unit of certification these shall be clearly named.
- 7.4** The names and addresses of any storage, processing, or distribution sites included in the operation (including subcontracted operations) that will potentially be handling certified products, up until the point where product enters further chain of custody.
- 7.5** Description of the receiving water body(ies).

ASC Seabass, Seabream and Meagre v1.1

European bass (*Dicentrarchus labrax*), Gilt-head bream (*Sparus aurata*)

The scope of the audit covers bass and bream farming operations a of the company Kilic in the site of Orfoz Deniz Baliklari Yetistiriciligi Projesi, production license B48.05.0069, feed suppliers and related hatcheries.

All fish processing happens in Kilic processing facility located in the Bodrum area, which already has ASC CoC certification.

Receiving water body is the Aegean Sea in front Turkey's coast, and inside the Mediterranean Sea. The area is identified as the Mandalya Gulf.

## 8 Audit Plan

- 8.1** The names of the auditors and the dates when each of the following were undertaken or completed: conducting the audit, writing of the report, reviewing the report, and taking the certification decision.

Auditors Francisco Padilla, James Brooks and Tulay Sahin.

Remote desktop review started on the 8th June. Phase I according to LR procedures, to include opening meeting, document request and review.

ICT test performed on the 8th of June to confirm signal availability in different parts of the facility.

Remote onsite audit conducted: on the between the 15th and 18th of June 2020. The LR remote app was used in combination with Microsoft Teams according to IFA MD4 recommendations. The LR remote app is capable of delivering video and audio in limiting conditions taking control of the client phone and "directing" the client to the relevant part of the facility. GPS coordinates and time are displayed at any time to confirm that evidence is verifiable. Picture and video evidence are captured when appropriate.

The remote phase was not fully successful, due to the lack of ICT onsite, or lack of digital supporting evidence. Therefore, the audit team decided to finalize the audit with an onsite visit, to inspect the site and review documents onsite. This second onsite phase was performed 2 months later due to COVID19 travel restrictions, and finally was performed from the 7th to the 8th of September.

Report written: From the 19th of June to the 24th of June.

Report reviewed: October 2020

Certification decision taken: 18/01/2021



**8.2 Previous Audits (if applicable):**

NC reference number	Standard clause reference	Closing deadline - status - closing date of each NC
8.2.1 Initial audit - 06/2019	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	All closed within required timelines.
Surveillance audit 1 - 09/ 2020	N/A	See audit report below.
Surveillance audit 2 - mm/ yyyy	N/A	N/A
Recertification audit - mm/ yyyy	N/A	N/A
Unannounced audit - mm/ yyyy	N/A	N/A
NC close-out audit - mm/ yyyy	N/A	N/A
Scope extension audit mm/ yyyy	N/A	N/A

**8.3 Audit plan as implemented including:**

	Dates	Locations
8.3.1 Desk Reviews	08/06/2020	Remote document share and review, using Microsoft teams and OneDrive shared folder.
8.3.2 Onsite audits	15 to 18-06-2020. 7 to 8-09-2020	REMOTE, to the site ONSITE, visit to the site.
8.3.3 Stakeholder interviews and Community meetings	N/A	No stakeholders were interviewed in this surveillance
8.3.4 Draft report sent to client	N/A	N/A
8.3.5 Draft report sent to ASC	N/A	N/A
8.3.6 Final report sent to Client and ASC	19/01/2021	N/A

**8.4 Names and affiliations of individuals consulted or otherwise involved in the audit including: representatives of the client, employees, contractors, stakeholders and any observers that participated in the audit.**

Cage Director.Emre Sen.  
Quality Manager Engin Mola  
Quality Assisstant Manager, Uğur Türkeş  
Veterinary Huseyin Turgay Ihtiyaroglu  
Site Manager EO  
MT diver mortality extraction.  
SBB diver mortality extraction.  
HO operator.

**8.5 Stakeholder submissions, including written or other documented information and CAB written responses to each submission at different stages of the certification process (audit notification, during on-sitt audit, public comment period)**

Name of stakeholder (if permission given to make name public)	Relevance to be contacted	Date of contact	CAB responded Yes/No	Brief summary of points Raised	Use of comment by CAB	Response sent to stakeholder
	none					

- 8.6 E5.1.i List of sites exempted from the scope of an initial audit and how they meet conditions in E5.1.i
- 8.6.1 E5.1.ii Justification for auditing site(s) meeting conditions under E5.1.i
- 8.7 E5.1.1.i List of sites removed after the initial audit
- 8.7.1 E5.2.2 Reason for the removal of sites from the certificate.
- 8.8 E5.4 Map of sites included in the unit of certification has been attached
- 8.9 E5.5 Site(s) in following period included in the audit (only for surveillance and re-certification audits)

**Audit report- ASC seabass, seabream and meagre v.1.1**

Corresponds to seabass, seabream and meagre standard v. 1.1

If the status is set to **delayed**, the NC reference number is **automatically** populated to the **NC delay sheet**. Please fill out the NC delayed sheet in case a NC close delay is requested.

Adjust the column width as needed to show the whole text or provide more space to write

If a VR was used or submitted for any indicator the VR number shall be noted in the VR column



Indicator	Indicator Text	Audit Evidence * Orfoz	Metric value	Evaluation	Description of NC	NC reference number	Date of detection	Deadline for NC close-out	Actual date of close-out	Status	VR *	Proposed by UoC and accepted by CAB				Evaluation by CAB (including evidence)
												Root cause analysis *	NC root cause - Corrective action *	NC Correction *	Preventive action *	
1.1.1	<p><b>Indicator:</b> Documents demonstrating compliance with all relevant local and national laws and regulations.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>For this first surveillance in 2020, all documents have been seen remotely. Engin Mola showed document using M Teams screen sharing and LR remote for hard copies. Regulation 1380 is the main regulation mentioned, also known as the fisheries regulation, there are references to web links for the following regulations in a printed resume: Aquaculture Regulation No. 25507 of 2004 (includes concession requirements in point 9), and application of principles with regard to the Regulation on Aquaculture included in (Notice 2006/1). Circular No. 2003/46 is related to leasing in Aquaculture Production Sites. Land and water use laws in Turkey are regulation No. 27951 of 2011 on concession of aquaculture production rights in seas and inland waters and concession of use of water needed in aquaculture investments.</p> <p>For 2020 and the site Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi the following copies are supplied, with no changes since last year inspection:</p> <ul style="list-style-type: none"> <li>• lease agreements or land titles presented dated from 3-5-2012 and valid for 15 years with conditions and taxes included.</li> <li>• permits from government agencies B48.05.0069 (new code for 2020-48-334 because there are changes) related to species permit, production and number of cages, bass and bream included.</li> <li>• aquaculture concession permit indicates 80.000 m2 and a total of 18 cages.</li> </ul> <p>In Turkey, controls happen according to legislation 1380. There are no government inspections in 2019 and 2020. Last available inspection presented as dated from 12-4-18, form EK-4, confirming 18 cages of 50 m diameter and fish quantities of 1 M bream 200 grams and 4.3M bream of 350 grams, signed by government officials. Declared production was 1500 tons of bream in 2017. No observations.</p>		Compliant												
1.1.2	<p><b>Indicator:</b> Documents demonstrating compliance with all tax laws.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Evidence presented for the last available year with links to <a href="https://mtvd.gib.gov.tr">https://mtvd.gib.gov.tr</a>. Tax certificates supplied for the company Kilic, a 5530035326. With quantities paid for 2016, 2017 and 2018 and 2019 stamp from government included. Report FOR 2019 EL elaborated by Mehmet Gunay.</p> <p>Public accountant review and report presented d, qualified accountant MG, related to a Turkish Government account inspection. The report includes all farms and all Kilic facilities.</p> <p>Tax service is managed internally by accounting departments, and tax are paid by Kilic for all sites, monthly payments presented for all sites.</p>		Compliant												
1.1.3	<p><b>Indicator:</b> Documents demonstrating compliance with all labor laws and regulations.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Main labour regulation is mentioned as act 4857, with updated presented in document 02.KL.LS.01.1 reviewed on the 16-03-2020</p> <p>Inspection presented for the site dated from 12-02-2019, with 2 non-conformities detected related to health and safety (related that diving and HS team meetings) closed on November 2019, confirmed during interview of site manager, see initials in the opening page of this report. Other previous inspection presented for the all the Kilic sites, dated from 28-11-16, observation mentioned about HS training length not been confirmed by the inspector.</p>		Compliant												

1.1.4	<p><b>Indicator:</b> Documents demonstrating compliance with regulations and permits concerning water quality impacts.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>This is a marine cage site, there is no discharge permits available. Government benthic sample happen every 3 year. Last samples records presented for the site, dated from 2018: results are including benthic parameter as well as water including DO (3 levels), ammonium, Nitrate, Nitrite, P, Chlorophyll. Performed by third party lab Barem Çevre. Trix index is used as a factor for several parameters with a target of below 4 for compliance. Last samples records presented for the site, results are Government is in charge of contracting the lab Barem Çevre:</p> <p>Evidence presented for Orfoz sample date 27-9-19, including begiatoa sampling and TOC Limit 25), benthic fauna, and final trix index of 3.16. Therefore, compliance with local regulations demonstrated.</p> <p>There are no changes in the last year in general Turkish Environmental regulations are included in 29186. Pollution and waste regulations in Turkey are captured in act 2872 -1983. Also, according to Article 13 of Fisheries Law No. 1380, the procedures and principles related to aquaculture are determined by the Aquaculture Regulation No. 25507 which was issued in 2004 and amended in 2007.</p> <p>Regulation 27257 include water and benthic sampling, includes sampling once per year. For benthic and twice a year.</p> <p>This regulation sets out rules for environmental protection. Circular No. 26413 also introduced the concept of assessment of the risk of eutrophication: Trix Index (mentioned above).</p>	Compliant														
2.1.1	<p><b>Indicator:</b> Redox potential or total 'free' sulphide levels in sediment immediately outside of the Allowable Zone of Effect (AZE) attributed to farm operations</p> <p><b>Requirement:</b> Redox potential &gt; 0 millivolts (mV) OR Sulphide &lt;= 1,500 microMoles/l OR No significant difference in redox potential or total 'free' sulphide levels in sediment at the edge of the AZE in comparison to control sites</p> <p><b>Applicability:</b> All farms</p>	<p>For 2020 and the site Kilic Orfoz Deniz an AZE map and sampling stations was presented in a benthic report. According to the position of the fish farm in the sea, 3 reference points and 3 sample points near the cages were determined with a distance of 25 m. Also taking into account the position of farm; several reference points are selected as follows:1 reference point at 500 m, one at 125m and one at 500 m distance passing the farm in the direction of the water flow. Therefore, a total of 6 sample points are used. There are no changes in the sampling positions from initial certification According to the report monitoring parameters sampling ISO 12878, (see reference with NC raised in point 2.1.2.)</p> <p>Kilic is selecting Redox as indicator for all it sites is selected to be used by Kilic for compliance. Sampling happened in December 2019, with a Sample collection followed strategy revised with a biomass in December of 2645 tons, and peak calendar year biomass 75%. Testing method used was an appropriate electrode SM 2580 B. Laboratory was Barem Çevre Laboratuvar Ve Dan. with accreditation as AB-0315T, including redox potential SM2180 B, the lab is also confirmed as accredited for ISO 17025. All information and report was summarized by the doctor Dr.Öğt.Üyesi Ahmet AYĞÜN. There are no changes since last year certification.</p> <p>Redox results presented are (minimum per station):</p> <p>T1=78.3 mV T2= 88.5 mV T3=93.5 mV R3= 126.5 mV R2= 117,3 mV R1= 126,9 mV</p> <p>F. and G are not applicable as option one is used.</p>	Compliant														
2.1.2	<p><b>Indicator:</b> Benthic faunal index score (choosing a suitable benthic index to the composition of the benthos being sampled)</p> <p><b>Requirement:</b> AZTI Marine Biotic Index (AMBI) score &lt;= 3.3, or Shannon-Wiener Index score &gt; 3, or Benthic Quality Index (BQI) score &gt;= 15, or Infaunal Trophic Index (IT) score &gt;= 25 or BENTIX score &gt;= 3.5 or No significant change in benthic faunal index scores at the edge of the AZE in comparison to control site</p> <p><b>Applicability:</b> All farms</p>	<p>For 2020, sampling was performed in December, at the site Kilic Orfoz Deniz Balıkları Yetiştiriciliği Projesi an AZE map was presented using a 25 meter rule and including additional 3 reference points.</p> <p>Option 1 was selected by client Kilic for the site. Sample collection followed near peak biomass strategy; see reference with evidence captures in the point above. AMBI results presented for the site as:</p> <p>T1= 1.743 T2= 1.575 T3= 1.556 R3= 1.554 R2= 1.676 R1= 1.222</p> <p>All information and report was summarized by the doctor Dr.Öğt.Üyesi Ahmet AYĞÜN. Credentials and qualification of the sampler presented as CV, indication Pfd tittle from 2012, experience confirmed in benthic analyses from 2017 in marine farms.</p> <p>E to I are non applicable as Option 1 was used by the client.</p>	Minor	<p>The ASC bass and beam standard requires following ISO 12878:2012 sampling methodology, which requires a sampling process using a mesh of 0.5 mm to 1 mm. A minor non-conformity is raised because none of the species mentioned in the report are of such a size. All species listed in the macrobenthic report are big mussels, clams, scallops, and other mollusk in the range of the 10 mm plus.</p>	1	08-Sep-20	07-Dec-20	N/A	Open	N/A	The lab that did the analysis for us was given the ASC Standart and they have misinterpreted the standart.	We will have a meeting and discuss the ASC Standart in detail with the lab to prevent misunderstandings and misinterpretation.					As this non-conformity requires sampling at peak biomass, we can justify granting an extension to a maximum of 12 months.

2.1.3	<p><b>Indicator:</b> For farms that use copper nets or copper-treated nets, evidence of testing for copper levels in the sediment immediately outside of the AZE</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All farms that use copper or copper treated nets</p>	<p>There are no changes since initial certification, copper nets are used only in juvenile cages, but there are some rest of antifouling in all nets. The quality manager states that antifouling nets are used in other sites and after one use and subsequent cleaning will be used at the site; therefore, this justifies the presence of some rest at the site. Evidence of copper testing presented, with levels in the sediment outside of the AZE for Kilic Orfoz seen as:</p> <p>T1= 17.24 mg/kg T2= 21.56 mg/kg T3= 28.51 mg/kg All are below 28.51</p> <p>R3= 22.52 mg/kg R2= 17.89 mg/kg R1= 17.04 mg/kg Method used EPA 200.7, confirmed as included in the laboratory accreditation.</p>	Maximum in T3= 28.51 mg/kg	Compliant																	
2.1.4	<p><b>Indicator:</b> Evidence that copper levels are &lt; 34 mg Cu/kg dry sediment weight</p> <p>OR</p> <p>In instances where the Cu in the sediment exceeds 34 mg Cu/kg dry sediment weight, demonstration that the Cu concentration is not significantly different compared to background concentrations as measured at three reference sites in the water body</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All farms that use copper or copper treated nets</p>	<p>NA. As copper levels in sediment immediately outside the AZE are under 34mg Cu/kg, see evidence above. So there is no need to compare with reference sites.</p>	N/A	N/A	NA. As copper levels in sediment immediately outside the AZE are under 34mg Cu/kg																
2.2.1	<p><b>Indicator:</b> Weekly average percent saturation of dissolved oxygen (DO) on farm (Appendix 1-2)</p> <p><b>Requirement:</b> ≥70%</p> <p><b>Applicability:</b> All farms</p>	<p>For 2020 and the Orfoz site it was possible to confirm the presence of 12 months of DO data results ranging from 82% in the afternoon to 98% in the morning. Average calculated. There are no missing records in all sampled documents, referenced as form 05-GN-FR-01. All weekly averages are ≥ 70%, Evidence presented for week 2 of January average DO 97.6 %. Therefore, there are no samples under 70%.</p> <p>D O monitoring and calibration witness was successful, as was possible to witness during the remote onsite inspections, oxyguard calibration confirmed to 99.6% saturation in air, which is considered acceptable.</p>	97%	Compliant																	
2.2.2	<p><b>Indicator:</b> Maximum percentage of weekly samples from 2.2.1 that fall under 2 mg/liter DO (Appendix 1-2)</p> <p><b>Requirement:</b> 5%</p> <p><b>Applicability:</b> All</p>	<p>Reviewed samples for the site and the period 2019 to 2020 indicate that none of the samples are below 4.4 ppm.</p>	4.4 ppm.	Compliant																	
2.2.3	<p><b>Indicator:</b> Quarterly monitoring of TAN, NO3, and TP levels on the farm and at a reference site (Appendix 1-3)</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All farms</p>	<p>For Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi quarterly monitoring data presented for N and P at the edge of the AZE. Last sample presented equals to:</p> <p>- TAN = 55 mg/l - NO3=0.094 mg/l -Phosphate=66 mg/l.</p> <p>Reference site</p> <p>- TAN= 25 mg/l - NO3=0.074 mg/l -Phosphate=44 mg/l.</p> <p>There are no relevant differences detected. It was possible to confirm that phosphate is measured instead of total Phosphorus, which is what the standard requires.</p>	- TAN = 55 mg/l - NO3=0.094 mg/l - Phosphate=66 mg/L	Minor	It was possible to confirm that phosphate is measured instead of total Phosphorus, which is what the standard requires.	2	08-Sep-20	07-Dec-20	18-Jan-21	Closed	N/A	There was a miscommunication with the lab on the subject of phosphorus analysis.	The lab has been informed we require phosphorus analysis not phosphate.							Root Cause Analysis, Corrective Action Plan and Evidence of water sampling according to Standard requirements was accepted as sufficient to close this non conformance.	

2.1.4	<p><b>Indicator:</b> Evidence that the type of biocides used in net antifouling are approved according to legislation in the European Union, the United States, Australia, or Japan</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All farms</p>	<p>As described in ASC handbook and shown by Engin using screen sharing capabilities. Antifouling used are Natrex AF, Netwax Ni3 and Netwax Ni4; with MSDS presented and supplied by Cakir Balıkcılık</p> <p>The quality manager states that antifouling nets are used in other sites and after one use and subsequent cleaning will be used at the site; therefore, this justifies the presence of some rest at the site. All nets have a dynema percentage which does not absorb antifouling. The net paint is copper based, concentration is between 2-12.%WT. (CAS-1317-39-1).</p> <p>Evidence of compliance with regulation presented for MSDS antifouling as Aquatic chronic 2 H411, in compliance with regulation 1272/2008/EC, 67/548/EEC and 1999/45/EC. There are no changes since initial certification.</p>		Compliant															
2.3.1	<p><b>Indicator:</b> The farm shall assess the Farm's (potential) impacts on biodiversity and nearby ecosystems that contains at a minimum the components outlined in Appendix 1 (see Standard).</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Environmental Impact Assessment for the site was presented in document ANKARA-2008, generic for all sites, elaborated by the government for all cages in the area. The document includes references to benthic impacts and trix index as main control measure. Risks associated with sensitive species are also included.</p> <p>There is another document 05.GN.TL.14 captures a ERA (environmental risk assessment), dated from 21/02/2019 includes identification of sensitives, escapes, effects, seawater impacts and sediments. Main risk is related with chemical, use as antibiotics and antifouling, controlled with samples as mitigation measures.</p> <p>Independent evidence was supplied as paper from Ege University, identifying the all relevant areas of Posidonia in the zone (Identified as sensitive habitats), None of them are located under the site. (Paper: Journal of Fisheries and aquaculture, 2024, volume 21, named Posidonia oceanic fauna in the Aegean Sea). There are no changes since initial certification and the report was made public in English and sent with original report.</p>		Compliant															
2.1.2	<p><b>Indicator:</b> Allowance for the farm to be sited in a protected area or High Conservation Value Areas<sup>150</sup> (HCVAs)</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All.</p>	<p>A map of the farm situation was supplied by Engin Mola. The nearest HCVA is located at 151 km from the area is identified as Gokova Korfezi. In 2020 the auditors asked for evidence uploaded in the ASC-GIS portal, and the polygons supplied by the client were cross-referenced by the auditor with information obtained with GPS coordinated obtained using the LR remote app and onsite second visit.</p> <p>The document 05-GN-TL-33 related to protective areas location, includes links to the government webpage and webpage protected planet as reference of sensitive areas location.</p> <p>Other sensitive area identified is Gediz area in Izmir at more than 300 km from the site.</p> <p>An updated declaration supplied by Kilic, for the site dated 21.05.2020, and signed by Emre Sen, Cage Director.</p> <p>No exception applies.</p> <p>The farm complies with indicator B ; therefore the site is eligible to maintain certification.</p>		Compliant															
2.3.3	<p><b>Indicator:</b> Allowance for the farm to be sited closer than 500 meters to a seagrass meadow(s) measure from the edge of the AZE</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All.</p>	<p>Map of all sites cages location was presented including Kilic 4 ASC certified sites, which indicates no presence of seagrass meadow sited at &lt;500m from the concession. The map indicates presence of seagrass areas in the Gulluk area, around 10 miles away from all Kilic farms in Mandalya Gulf area</p> <p>Independent documentation was presented as a government and university paper and government EIA for the area named "Sea Follow Up area"</p> <p>As the site is identified as around 40 meter depth in benthic sampling, an ROV filming was asked to be witness during the first onsite visit, the Orfoz video of the bottom shows wild seabass and no sings of seagrass under at randomly selected sample located around 500 meters from the cages.</p> <p>Declaration stating that the farm is not sited a less than 500 meters from a seagrass meadow, was presented by Kilic, for the site and signed by cage manger dated 21.05.2020</p>		Compliant															
2.4.1	<p><b>Indicator:</b> Use of submerged acoustic deterrent devices</p> <p><b>Requirement:</b> Not allowed</p> <p><b>Applicability:</b> All</p>	<p>Written statement related to non-use of submerged marine ADD's and /or AHD's, presented, dated from 25-5-2020 and signed by Emre Sen.</p> <p>There are no bird nets installed at the site, as the company only use bird nets in winter to protect cages from predator in the risky season. There are no submerged secondary nets installed. The bird control seen at the site is acoustic device used only suitable for air used. No incidents declared by employees.</p> <p>No indication of submerged ADDs or AHDs was seen during the initial inspection and second onsite performed in September 2020.</p>		Compliant															

2.4.2	<p><b>Indicator:</b> Number of mortalities of endangered or red-listed animals in the farm lease area and adjacent areas due to farm operations, personnel or associates over the previous 2 years</p> <p><b>Requirement:</b> 0.</p> <p><b>Applicability:</b> All.</p>	<p>There are no bird nets installed at the site and no submerged predator nets List of red listed species was presented by Engin Mola, including 5 species as Thymus thymus, Caretta Caretta, dolphin and monachus monachus. A complete list with description and IUCN status is included in the document GN.01ek.01 which also includes documented procedures for red listed species. Documented procedures include in 05.GN.TL.33 related to wildlife conservation confirmed as present.</p>	0	Compliant																	
2.4.3	<p><b>Indicator:</b> Allowance for intentional lethal action against predators/wildlife on the farm site.</p> <p><b>Requirement:</b> None, unless human safety is immediately threatened.</p> <p><b>Applicability:</b> All.</p>	<p>For each Kilic site records of predators controls are included in document 05.GN.FR.31, which indicates daily records of observations with signatures, only seagulls and one similar specie to amberjack are included in records. There are no bird nets installed or secondary nets underwater; therefore, records are consistent with operations. Several employees were selected for private interview during the onsite visit in September, both confirmed the information mentioned in the records above.</p>	0	Compliant																	
2.4.4	<p><b>Indicator:</b> All lethal incidents are recorded and categorized and reported to ASC.</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There are no lethal incidents at the site. This is confirmed to be reported publicly in the company webpage. <a href="https://www.kilicseafood.com/environmental-responsibility">https://www.kilicseafood.com/environmental-responsibility</a></p>	0	Compliant																	
2.4.5	<p><b>Indicator:</b> In the event of any lethal incident, evidence that an assessment of the probability of lethal incident(s) has been undertaken and demonstration of concrete steps taken by the farm to reduce the risk of future incidences</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>NA. Documented risk assessment for wildlife interactions is included in document 05.GN.TL.33, there are no changes in 2020. Implementation of procedures and no lethal actions confirmed during the interview of employees several employees selected, see opening page of this report.</p>		N/A	NA. No lethal incidents.																
3.1.1	<p><b>Indicator:</b> Culture of a non-native species.</p> <p><b>Requirement:</b> None, unless the farmed species is ecologically established in the region at time of publication of the ASC Seabass, Seabream, and Meagre Standard v1.0</p> <p><b>Applicability:</b> All.</p>	<p>Only bass and bream are produced in at the site, which are native in Turkey. FAO page was presented for evidence indicating presence of the species in the area.</p>		Compliant																	

3.2.1	<p><b>Indicator:</b> Culture of transgenic fish</p> <p><b>Requirement:</b> Not permitted</p> <p><b>Applicability:</b> All.</p>	<p>Declaration of not use of transgenic stock presented updated for this 20202 inspection, dated 21-5-2020, signed by Engin Mola for the 4 Kilic sites.</p> <p>There is a new software developed by Kilic called Kilic Aqua, shown using screen sharing capabilities by IT department manager. Record input every 5 days, with actual status seen on the audit day. Some seabass cages have 5% seabream</p> <p>Records of stock inputs presented, the actual stock is originated in:</p> <p>Akarca Kuluckahane Adaptasyon Tesisi Bafa Kuluckahane Adaptasyon Tesisi Ozbaser Adaptasyon Tesisi</p> <p>Actual total input of fish is 12843490, confirmed in software Kilic Aqua, and excel files and with individual records available.</p> <p>All supplies are internal from the hatcheries mentioned above that are owned by the Kilic group. Input stock records identify genetic status in non-GMO declaration dated 21-1-2019 covers all Kilic harvest.</p>		Compliant																	
3.3.1	<p><b>Indicator:</b> Evidence of a well-designed, maintained and managed culture system, infrastructure and farm management<sup>(19)</sup> to minimize escapes during grow-out and harvest.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>At Kilic, it was possible to confirm the presence of an Escape Prevention and Management Plan as included in the document 05.GN.TL.34, last reviewed in June-2020, The document includes maintenance procedures in page 1. Records of inspections present in form "cage control". The site is an open net pen site, presented Escape Prevention Maintenance net plan coded as 05.GN.TL.35 includes:</p> <ul style="list-style-type: none"> <li>-net strength testing in point 4</li> <li>- use of appropriate net mesh size in point 13</li> <li>- net traceability in page point 1</li> <li>- system robustness in point 7</li> <li>- predator management in point 10</li> <li>- record keeping in page poin1</li> <li>- reporting risk events demonstrated in daily forms cage control"</li> <li>- staff training confirmed as performed see point 3.3.1.e below.</li> </ul> <p>Orfoz Plan implantation demonstrated in record documents of:</p> <ul style="list-style-type: none"> <li>- Net inspection. Evidence presented for the last available inspection, dated 31-5-19 including, 8 cages inspected, and no holes. Bigger repair seen 2 by 3 dated 17-8-19.</li> <li>-Orfoz, evidence of net traceability presented for net 11936 -code 4015, seen during the remote inspection in cage A4. Breaking test 87 kgs.</li> <li>Orfoz training on escape prevention and management, confirmed as performed on the 27-5-19, with a total of 6 employees. Including escape prevention and counting technologies. Confirmed during interview of MT and SM.</li> </ul>		Compliant																	
3.3.2	<p><b>Indicator:</b> The farm shall count all fish at every stocking, grading and harvest event with a counting accuracy of ≥98%<sup>(19)</sup></p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>In Kilic Counting method has been changed to counting machines to achieve ASC certification in 2019. Previously, some fish were counted by hand and others during vaccination.</p> <p>All fingerlings suppliers are own Kilic hatcheries.</p> <p>Counting procedures and calibration was witnessed during this first surveillance audit at the Kilic hatchery using LR remote, sing the machine Counter, model F100 from the company Yongatek, which according to technical information has an accuracy of 99%. The calibration process was explained by the hatchery manager, Aliak Kose interviewed remotely; calibration is performed by external company with records available for the last calibration.</p> <p>Orfoz fingerling suppliers are own Kilic hatcheries counting method an samples presented showing an average error of 1.8%.</p> <p>Calibration was witnessed during the onsite visit, for bass counting is happening together with new vaccination system, with a sampled accuracy of 99.9%. For bream counting is happening at the hatchery using scanners (Counter F100) with a target accuracy of 98%, sampled error are around -0.67 to 0.83%. Procedure seen in document YNGTK/16-03</p>	98% at a minimum	Compliant																	
3.3.3	<p><b>Indicator:</b> Total amount of known escapes allowed per production cycle</p> <p><b>Requirement:</b> 4% of stocked count based on ≥98% counting accuracy</p> <p><b>Applicability:</b> All.</p>	<p>For the site records of escapes presented in 2019 (last complete calendar year) production report in excel format, which indicates a total zero. Final escape counts for the last calendar year presented also as 0 %</p> <p>For the actual calendar year accumulative escapes calculated for the site is also zero.</p> <p>Procedures and records demonstrate ongoing and continuous monitoring, in production excel files. Records of escapes are included in daily cage and site inspection, where there are repair records and size for every repair. No relevant holes seen in sampled reports with normal records between 3 to 1 meshes. Net inspection. Evidence presented for the last available inspection, dated 31-5-19 including, 8 cages inspected, and no holes. Bigger repair seen 2 by 3 dated 17-8-19.</p>	0	Compliant																	



3.3.4	<p><b>Indicator:</b> Total amount of unexplained loss per production cycle</p> <p><b>Requirement:</b> 2% of stocked count based on ±98% counting accuracy</p> <p><b>Applicability:</b> All.</p>	<p>Site records of mortalities, stocking count and harvest count present in Excel files exported from new traceability software Kilic Aqua, as follows:</p> <p>Input fish 12811711 Mortality 935601 Harvest 12037243 Escapes 0 Unexplained -161133 Unexplained % -1.26%</p>	-1.26%	Compliant																		
3.3.5	<p><b>Indicator:</b> Number of known escapes and unexplained losses are documented and made public as well as reported to ASC on an annual basis.</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All.</p>	<p>For the site records of escapes presented in 2019 (last complete calendar year) production report in excel format, which indicates a total zero. Final escape counts for the last calendar year presented also as 0 %</p> <p>For the actual calendar year accumulative escapes calculated for the site is also zero. Procedures and records demonstrate ongoing and continuous monitoring, in production excel files. Records of escapes are included in daily cage and site inspection, where there are repair records and size for every repair. No relevant holes seen in sampled reports with normal records between 3 to 1 meshes. Net inspection. Evidence presented for the last available inspection, dated 31-5-19 including, 8 cages inspected, and no holes. Bigger repair seen 2 by 3 dated 17-8-19. Declaration in the web page included, the sea bream and sea bass species cultivated in Kilic Marine Products cage enterprises systems and Bafa Su Ürünleri A.Ş. There is no fish leakage observed in 2020 for the trout which is grown in the cage enterprises systems. In case of possible fish leakage in our facilities where the ASC standard is applied, the local authorities and the ASC committee will be informed and the leakage amount and information will be published at <a href="https://www.kilicseafood.com/environmental-responsibility">https://www.kilicseafood.com/environmental-responsibility</a></p>	0	Compliant																		
3.4.1	<p><b>Indicator:</b> Source of fingerlings</p> <p><b>Requirement:</b> Hatchery only</p> <p><b>Applicability:</b> All.</p>	<p>Fingerlings used are all produced in own Kilic hatcheries. See input number in point above and evidence of traceability in the point below.</p>		Compliant																		
3.4.2	<p><b>Indicator:</b> Traceability of all hatchery purchased fingerlings to their source.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>All traceability is kept in new traceability software Kilic aqua, since summer 2019, fully implemented as corrective action of non-conformities raised in the last ASC inspections. as corrective actions. Fingerlings used are all produced in own Kilic hatcheries. See input number in point above. Evidence sample presented for batch seen during the onsite inspection: : Orfoz, A4 input 20-2-2018 648439 fish origin batch C52 hatchery Bafa. (no antibiotic) Vet control reports available recorded to 05.GN.FR.27.</p>		Compliant																		
3.4.3	<p><b>Indicator:</b> The fingerling supplier has a documented fish health and bio-security protocol or a comparable 3rd party certificate</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>The hatcheries Akarca, Bafa and Ozbaser are all owned by Kilic. The company presented adequate separate health management plans for the hatchery stage as included in document coded as 02-BS-PL-03. There are no changes since last year inspection.</p>		Compliant																		
3.4.4	<p><b>Indicator:</b> The receiving facility has a documented bio-security protocol, including quarantining, with respect to purchased fingerlings</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>There are no changes since initial certification site, presented a biosecurity protocol for receiving purchased fingerlings as included in the document 01.JSG.FR.46, dated from 8.02.2019. All purchases are internal from own hatcheries.</p>		Compliant																		

3.4.5	<p><b>Indicator:</b> All trans-national imported fingerlings must be accompanied by documentation required by importing countries (e.g. health certificate)</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>There are no changes since initial certification, all fish supplied nationally from Kilic own hatcheries in Turkey; the hatcheries, Akarca, Bafa and Ozbaser are confirmed to be located in Turkey. Health certificates seen in sampled inputs.</p>		Compliant																
4.1.1	<p><b>Indicator:</b> Evidence of traceability, demonstrated by the feed producer, of all fishmeal and fish oil ingredients</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Mass balance available for the last calendar year (2019) according to standard requirements. With information also available for 2020.</p> <p>Feed suppliers presented for only supplier Kilic Aqua, which included a total of 46,735,843 kg for all batches managed as the feed plant included in a complete mass balance exercise that captures all raw materials and outputs. Evidence was cross-referenced with information seen at the site with feed reception records and batches, with indicates all feed is supplied by Kilic Aqua, and all records include batch ID. Communication to feed suppliers was not necessary as all suppliers are internal from own Kilic feed mill.</p> <p>Feed suppliers is only Kilic Aqua which is confirmed to have a valid certificate number as 00064-KXXPT-0004 and GGN as 4050373703677D. Declaration from feed supplier presented in letter, dated 21-3-19 which includes traceability assurance of all fishmeal and fish oil ingredients in feed. Signed by Engin Mola.</p>		Compliant																
4.2.1	<p><b>Indicator:</b> Fishmeal Forage Fish Dependency Ratio (FFDRm) for grow-out (calculated using formulas in Appendix 2 (see standard))</p> <p><b>Requirement:</b> (a) <i>Dicentrarchus labrax</i> and <i>Sparus aurata</i>: <math>\leq 1.85</math> (b) <i>Argyrosomus regius</i>: <math>\leq 2.75</math>, <math>\leq 2.5</math> (3 years), <math>\leq 2.35</math> (6 years) (c) <i>Pagrus major</i>: <math>\leq 4.5</math>, <math>\leq 3.5</math> (3 years), <math>\leq 2.5</math> (6 years)</p> <p><b>Applicability:</b> All.</p>	<p>FFDRm calculations presented with a final result of 1.84, calculated based in a 24% fish meal, and an eFCR calculation presented as 1.84. All confirmed as accurate with auditor calculations.</p>	1.84	Compliant																
4.2.2	<p><b>Indicator:</b> Fish Oil Forage Fish Dependency Ratio (FFDRo) for grow-out (calculated using formulas in Appendix 2 (see standard))</p> <p><b>Requirement:</b> All species <math>\leq 3</math>, <math>\leq 2.95</math> (3 years), <math>\leq 2.9</math> (6 years)</p> <p><b>Applicability:</b> All.</p>	<p>FFDRo calculations presented with a final result of 0.93; calculated based in 4% deducting salmon oil, and an eFCR calculation presented as 1.84. All confirmed as accurate with auditor calculations.</p>	0.93	Compliant																
4.3.1	<p><b>Indicator:</b> Timeframe for at least 90% fishmeal or fish oil used in feed to come from fisheries certified under an ISEAL member's accredited certification whose primary goal is to promote ecological sustainability</p> <p><b>Requirement:</b> &lt; 5 years after the date of publication of the Sea Bass/Sea Bream standards (see note above)</p> <p><b>Applicability:</b> All.</p>	<p>Letter of intent presented, dated 21-01-19 and signed by Engin Mola. Confirmed as including points related to commitment to use fishmeal and fish oil from scheme that is ISEAL member. There are no changes since last year</p>		Compliant																

4.3.2	<p><b>Indicator:</b> Prior to achieving 4.3.1 the fishmeal or fish oil used in feed must have a FishSource stock health score of 6.0 or higher or show evidence of being engaged in a credible and time bound fisheries improvement project (FIP)</p> <p><b>Requirement:</b> All stock health scores ≥ 6 (see note above)</p> <p><b>Applicability:</b> All</p>	<p>For 2020 fishscores are presented for the following species:                  -Anchoveta southern Peru. Both stock fish health of ≥ 6.                  -Atlantic chub mackerel NE Atlantic. Both stock fish health of ≥ 6.                  -Atlantic mackerel NE Atlantic current health 10 future 7.8.                  -Coho salmon Alaska. current health 8 future &gt;6.                  -European anchovy, Black sea, current health &gt;6 future 6.7.                  -South American pilchard. Japanese Pacific. Both stock fish health of ≥ 6.                  All information supplied in pdf printed pages of the Fishsource webpage.</p>	Both stock fish health of ≥ 6.	Compliant																		
4.3.3	<p><b>Indicator:</b> Feed containing fishmeal and/or fish oil originating from by-products<sup>[29]</sup> or trimmings from fish species which are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species<sup>[30]</sup></p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	<p>For 2020, the complete list of trimmings origins presented, including the following species:                  -Salmo Salar.                  -Onchynchus mykiss                  -Coho salmon                  -Sardina pilchardus, NT or LC (therefore in compliance)                  -Scomber colias, NT or LC (therefore in compliance).</p>		Compliant																		
4.3.4	<p><b>Indicator:</b> Feed ingredients which come from other fish from the same genus</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	<p>Feed supplier declaration from Kilic Aqua presented, where no use of the same genus under cultivation is confirmed to be included in the declaration, dated 21-3-18.                  Procedures from feed supplier presented in 04-UR-TL-02.(rev-27-4-19) Which describes non use of the same genus in bass and bream diets in page 1 point. There are no necessary updates from last year</p>		Compliant																		
4.4.1	<p><b>Indicator:</b> Presence and evidence of traceability and a responsible sourcing policy for the feed manufacturer for feed ingredients which comply with internationally recognized moratoriums and local laws</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>For 2020, all feed is supplied by own feed factory Kilic Aqua, information was crosscheck with records in Excel files, supplied for mass balance exercise seen in point 4.1.1                  Feed supplier declaration was presented by Kilic Aqua dated 21-1-19 and signed by Engin Mola, which includes compliance with recognized crop moratoriums in page one second paragraph.                  Evidence of third- party audits presented in GGAP compound feed manufacturing reference number 00064-KXXPT-000.</p>		Compliant																		
4.4.2	<p><b>Indicator:</b> Documentation of the use of transgenic<sup>[32]</sup> plant raw materials, or raw materials derived from genetically modified plants, in the feed</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>For 2020, a declaration presented by Kilic confirming that soy may contain more than 0.9% transgenic soy; with a list of 10 different codes for modified soy.</p>		Compliant																		

4.4.3	<p><b>Indicator:</b> Percent of non-marine ingredients from sources certified by an ISEAL Member's certification scheme that addresses environmental and social sustainability</p> <p><b>Requirement:</b> 80% for soy and palm oil within 5 years following the date of the publication of the ASC Sea Bass, Sea Bream, and Meagre Standard</p> <p><b>Applicability:</b> All.</p>	<p>Declaration stating the farm's intent to source feed that contains non-marine ingredients certified under an ISEAL member standard presented in Feed supplier declaration by Kilic Aqua dated 21-5-2020. The manager understand the 2024 target and limitations. Actual percentage is 57%.</p>		Compliant														
4.5.1	<p><b>Indicator:</b> Evidence that non-biological waste (including net pens) from grow-out site is either disposed of properly or recycled.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Kilic waste management plan is included in document 05.GN.TL.36, last update dated from 13.03.2019. Proper waste disposal was confirmed during the onsite inspection. Waste is separated according to type of origin and material as mortality, feed waste, feed bags, medicines, human waste. Waste oils, club cloths, oil filters, contaminated packaging, waste oil smeared fine sawdust material, empty spray cans etc. waste are qualified as Hazardous Waste. A minor non-conformity was identified din 2020 inspection as it was possible to identify a concrete tank at the net cleaning area on land, with an excessive amount of sludge accumulated.</p>		Minor	<p>It was possible to identify a concrete tank at the net cleaning area with an excessive amount of sludge accumulated.</p>	3	08-Sep-20	07-Dec-20	20-Oct-20	Closed	N/A	<p>Because the disused and out of commission treatment plant is far away from the Area of Operation the smell of the sludge has not been noticed.</p>	<p>The tanks of the treatment plant will be checked often to prevent further accumulation.</p>					<p>Root Cause Analysis, Corrective Action Plan and Evidence of cleaned concrete waste tanks, was accepted as sufficient to close this non conformance.</p>
4.5.2	<p><b>Indicator:</b> Evidence of appropriate storage and/or disposal of biological waste</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Kilic procedure to manage biological waste is confirmed as included in 05.GN.TL.36, the document describes mortality recover from cages and storage in bins (which was confirmed during the remote an onsite inspection); final destination is the authorized facility Mavi Deniz Yem Hammaddelei ve Geri Donusum. Regarding net cleaning the above mentioned procedure states that sludge, mussel and algae wastes from net cleaning to be physically separated in the washing process. These wastes will be sent to the Licensed Waste Receiving Facility by means of Waste Reception Vessel and sent to disposal from here. Site mortality evidence of last disposal presented as: Morts taken by "Mavi Deniz Yem Hammaddelei ve Geri Donusum" records seen for 10.06.2020.</p>		Compliant														
4.5.3	<p><b>Indicator:</b> Evidence of appropriate storage and/or disposal of chemical and hydrocarbon wastes</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Chemical management procedures are included in 05.GN.TL.37. All chemicals, oils and fuel seen during the remote and onsite phases are confirmed to have appropriate secondary containment.</p>		Compliant														
4.5.4	<p><b>Indicator:</b> Spill prevention and response plan for chemicals/hydrocarbons originating from farming operations</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Kilic spill prevention plan is included in 05.GN.TL.37 dated 21.02.2019, there are 10 points including appropriate preventive measures (for example point 9.9 States sand is applied on the ground against leakage and spillage of chemical wastes stored in the waste area. Maintenance and controls done by own staff. Recorded to 05.GN.FR.10. There are no changes in procedures since initial certification, but implementation has improved since the site joined the ASC program. All chemicals, oils and fuel seen during the remote and onsite phases are confirmed to have appropriate secondary containment.</p>		Compliant														
4.5.5	<p><b>Indicator:</b> For any farm that cleans nets on-land, evidence that net-cleaning sites have effluent treatment</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>Nets are cleaned on-land in facilities owned and controlled by Kilic. Evidence of effluent report presented dated from 11-6-18. The report describes treatment system as using flocculants to capture sediments. Evidence of capturing copper presented in sample dated from 25/9/2019; as a result of a non-conformity raised last year, with copper in water under 0.001 mg/l. All evidence is considered satisfactory.</p>		Compliant														

4.6.1	<p><b>Indicator:</b> Presence of an energy use assessment verifying the energy consumption on the farm and representing the production cycle, as outlined in Appendix 3</p> <p><b>Requirement:</b> Within two years of the initial audit (measured in kilojoule/t fish/production cycle)</p> <p><b>Applicability:</b> All</p>	<p>Energy assessment presented for all Kilic farms with numbers presented per site in annual report for the last 3 years. Final numbers are calculated in GHG, see below. It is noted that this is first surveillance, therefore this point will be alliable next visit.</p>		N/A	<p>It is noted that this is first surveillance, therefore this point will be applied next visit.</p>															
4.6.2	<p><b>Indicator:</b> Records of greenhouse gas (GHG) emissions on farm and evidence of an annual GHG assessment, as outlined in Appendix 3(see standard)</p> <p><b>Requirement:</b> Yes, within two years of the initial audit</p> <p><b>Applicability:</b> All</p>	<p>It is noted that this is first surveillance, therefore this point will be applicable next visit. Energy assessment presented for all Kilic farms with numbers presented per site in annual report for the last 3 years. Final numbers are calculated in GHG for all cages as 2715,56 kgCO2 equip/ton product. The company is demonstrating progress and full compliance in expected next year.</p>		N/A	<p>It is noted that this is first surveillance, therefore this point will be applied next visit.</p>															
4.6.3	<p><b>Indicator:</b> Documentation of GHG emissions of the feed<sup>(36)</sup> used during the previous production cycle reported to ASC, as outlined in Appendix 3 subsection B</p> <p><b>Requirement:</b> Yes, within three years of the initial audit</p> <p><b>Applicability:</b> All</p>	<p>It is noted that this is first surveillance, therefore this point will be apply next visit. For feed total value for all Kilic sites is 32,1592 Kg/Co2 per ton of feed.</p>		N/A	<p>It is noted that this is first surveillance, therefore this point will be applied next visit.</p>															
4.6.4	<p><b>Indicator:</b> Evidence of a documented strategy to reduce GHG per unit of production (measured in kilojoule/t fish produced)</p> <p><b>Requirement:</b> Yes, within three years of the initial audit</p> <p><b>Applicability:</b> All</p>	<p>It is noted that this is first surveillance, therefore this point will be apply next visit.</p>		N/A	<p>It is noted that this is first surveillance, therefore this point will be applied next visit.</p>															

5.1.1	<p><b>Indicator:</b> Evidence of a veterinary approved Fish Health Management Plan (FHMP)</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>For 2020 an updated Fish health management plan is included in document 05.GN.PL09, (present in QDMS system) dated from 04-9-2020,(changes are related to mortality classification) which includes the following main diseases:  Viral Diseases: Viral Encephalopathy-Retinopathy (VER) -Nodavirus · Viral Nervous Necrosis (VNN) -Nodavirus- Fish Lymphocystis Disease (FLDV): Epitheliocystis (Rickettsia)  Bacterial Diseases: Vibriosis, Aeromoniasis, Pasteurellosis, Flexibacteriosis, Pseudomoniasis, Mycobacteriosis, Nocardiosis and Staphylococco  There is a are references to FDA and EU in MRL and antibiotics approved. The document also includes a list of reportable diseases according to thee OIE as 1-Epzootic hematopoietic necrosis (Epizootic haematopoietic necrosis) 2-Epzootic ulcerative syndrome (Epizootic ulcerative syndrome)3-Viral hemorrhagic septicaemia (VHS)4-White spot disease5-Yellowhead disease 6-Taura syndrome 7-Infectious hematopoietic necrosis of fish (IHN) 8-Infectious salmon anaemia (Infectious salmon anaemia) 9-Perkinsus marinus infection (Infection with Perkinsus marinus) 10-Microcytos mackini infection (Infection with Microcytos mackini) 11-Martellia refringens infection (Infection with Martellia refringens) 12-Bonamia ostreae infection (Infection with Bonamia ostreae) 13-Bonamia exitiosa infection with Bonamia exitiosa) 14-Koi herpes virus disease 15-Spring Viraemia of Carp (SVC) 16-Crayfish plague (Crayfish plague) 17-Bacterial kidney disease (BKD)  Monitoring is described as "Macroscopic and microscopic examination of the health of the incoming fish should be performed in order to control the health. Fish issued health certificate", and training of employees is described as "employees who make who manage fish must be trained and responsible". Page 5 of the FHMP includes vaccination of stock including the following vaccines used as: Alphadip vibrio, Pharmaq, Alphajet Pharmaq Aquavac Pasteurella Vibrio MSD. Designated veterinarian is Huseyin Turgay Ihtiyaroglu, confirmed as approving the FHMP.</p>		Compliant													
5.1.2	<p><b>Indicator:</b> Farm maintains a fish health management record keeping system</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All.</p>	<p>Record keeping system used are new Kilic aqua Fishtime software. Procedures are confirmed to be followed in during the interview of the veterinary Huseyin Ihtiyaroglu. There are also document records of health inspection, and records of antibiotic treatments at the hatchery reported to the government new online system.</p>		Compliant													
5.2.1	<p><b>Indicator:</b> Use of therapeutic treatments that are listed as critically important for human medicine by the World Health Organization</p> <p><b>Requirement:</b> Not permitted.</p> <p><b>Applicability:</b> All.</p>	<p>For the site there are no treatments declared at the farm stage only at the hatchery stage. See list of treatments in point 5.2.5. Confirmed during site manager and veterinary interview. No WHO CIA used at the site or hatchery stage.</p>		Compliant													
5.2.2	<p><b>Indicator:</b> Prophylactic use of chemical antimicrobial treatments.</p> <p><b>Requirement:</b> Not permitted.</p> <p><b>Applicability:</b> All.</p>	<p>There are no treatments at the site, all is happening at the hatchery stage, see evidence in point 5.2.5. Fish inspected during the onsite visit evidenced good health status with a small percentage of bacterial infections in the mortality extraction witnessed by auditor.</p>		Compliant													
5.2.3	<p><b>Indicator:</b> The farm shall document all chemicals and therapeutants used during the most recent production cycle</p> <p><b>Requirement:</b> Yes..</p> <p><b>Applicability:</b> All.</p>	<p>All chemical and antibiotic treatments are recorded in traceability software, excel files, government online report system and supporting documents. Treatments are only happening at the hatchery stage at Kilic, see detail evidence in point 5.2.5 of this report.</p>		Compliant													

5.2.4	<p><b>Indicator:</b> Number of anti-parasitic treatments allowed over the most recent production cycle, including the hatchery</p> <p><b>Requirement:</b> 1.</p> <p><b>Applicability:</b> All.</p>	<p>Record keeping system used are new Kilic aqua Fishtime software. Procedures are confirmed to be followed in during the interview of the veterinary Huseyin Intiyaroglu. For the site there are no treatments declared at the farm stage only at the hatchery stage and no antiparasitic treatments applied. See list of treatments in point 5.2.5. Confirmed during site manager and veterinaries interviews.</p>	0	Compliant																	
5.2.5	<p><b>Indicator:</b> Number of treatments of antibiotics over the most recent production cycle, including the hatchery</p> <p><b>Requirement:</b> ≤ 3</p> <p><b>Applicability:</b> All</p>	<p>No antibiotic treatments used at the site for the last and actual cycle. All treatments are recorded at the hatchery stage, see principle 8 of this report. A maximum of one antibiotic use per batch is recorded at hatchery stage, this is confirmed during interview of Kilic production manager, who states that a preventive approach and feed use is paying off. The hatchery veterinary was interviewed and declared the following substances used in 2019 harvested fish, tetracycline 107 kg, Sulfadiazine-trimethoprim 15 kg and sulfamethoxazole-trimethoprim 9 kg. The vet stated that only one treatment of the above mentioned substances is used per batch, which is considered credible as fish will only stay at the hatchery until the 10 to 15 grams approx.</p>	1	Compliant																	
5.3.1	<p><b>Indicator:</b> All recovered mortalities are removed and disposed of in a responsible manner</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>During this 2020 inspections it was possible to confirm that mortality records are captured in a form named as "daily cage feed and mortality control", indicating a schedule of every day in the surface and every 3 days at the bottom of the cages. Mortality extraction was witnessed during this surveillance and all the process was satisfactory. No exceptional events stated or recorded at the site, therefore, post-mortem analysis was stated not to be necessary.</p>		Compliant																	
5.3.2	<p><b>Indicator:</b> Classification of mortalities</p> <p><b>Requirement:</b> All recovered mortalities are recorded and classified by cause of death</p> <p><b>Applicability:</b> All</p>	<p>In 2020 in the Orfor site mortality extractions was witnessed using the LR remote app in cage number A4. Mortality extraction was witnessed during the remote inspection using LR remote, to the site as performed by diver in around 14 minutes during this inspection. Diver MT performed the mortality classification of 138 morts classifying by cause and opening suspicious fish. Numbers are transferred to the barge using the radio, and appropriately captured in mortality forms.</p>		Compliant																	
5.3.3	<p><b>Indicator:</b> When unexplained mortalities exceed ≥0.5% / per day, samples are submitted for analysis by a veterinarian or designated fish health expert</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All.</p>	<p>Site mortality records presented, indicating that unexplained mortality are not exceeding 0.5% per day. Evolution records presented for the site in new traceability software Kilic Aqua Fishtime. with no peaks detected over 0.5%</p>		Compliant																	
5.3.4	<p><b>Indicator:</b> Evidence of a farm specific mortalities reduction program that includes defined annual targets for reductions in mortalities and reductions in unexplained mortalities.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>For 2020, the company generated a new specific plan to reduce unexplained mortalities with targets per site. The document is coded 05.Gn.PL.17.0. For the site Orfor unexplained mortality was 10.72% for the last cycle and the target is to reduce it in 2% for the next cycle.</p>		Compliant																	

6.1.1	<p><b>Indicator:</b> Evidence that workers have access to trade unions (if they exist) and union representative(s) chosen by themselves without managerial interference.</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There are no unions appointed at the site. The company request new worker representatives each year. There are three (3) workers representatives. The candidates are then voted for by the workers. The last election was held on the 20/11/2019 The election is carried out in accordance with the regulation 28750.</p> <p>The election record document number is 01.isg.LS.51 dated 20/ 11/2019.</p> <p>The worker representatives confirmed that they had access to the workers and the workers could approach them at any time.</p> <p>There are defined conditions for representatives. These are recorded on document 01.isg.FR.120 dated 23/07/2019</p> <p>Worker meeting are held. Document Number 01.isg.FR.115 The last meeting was held on the 13/08/2020</p> <p>The topic covered were</p> <ul style="list-style-type: none"> <li>•Worker lockers</li> <li>•Food that's provided</li> <li>•The company to provide sun cream</li> </ul> <p>There is evidence that company addresses the issues were possible.</p>		Compliant																		
6.1.2	<p><b>Indicator:</b> Evidence that workers are free to form organizations, including unions, to advocate for and protect their rights.</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>The company are following regulation 28750 for Freedom of Association to ensure that workers' rights are protected. The contract of employment clearly states that workers have the right of Freedom of Association</p>		Compliant																		
6.1.3	<p><b>Indicator:</b> Evidence that workers are free and able to bargain collectively for their rights.</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There are no outstanding cases against the farm site management for violations of employees' freedom of association and collective bargaining rights. BSCI training is provided to management that covers this indicator.</p>		Compliant																		
6.2.1	<p><b>Indicator:</b> Number of incidences of child labor</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All except as noted 6.2.1a</p>	<p>The company has an established Child Labour stating the company will not employ persons under the age of 18. Kilic obtains National Identification documentation during the recruitment process. ID documents are copied and held on file for 2 years after they leave the company. The youngest worker on site is 21 years old.</p>		N/A	The youngest worker on site is 21 years old.																	
6.2.2	<p><b>Indicator:</b> Percentage of young workers that are protected</p> <p><b>Requirement:</b> 100%</p> <p><b>Applicability:</b> All</p>	<p>The youngest worker on site is 21 years old.</p>		N/A	The youngest worker on site is 21 years old.																	



6.3.1	<p><b>Indicator:</b> Number of incidences of forced, bonded<sup>(49)</sup> or compulsory labor</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	<p>All employees are provided with Contracts of Employment at the commencement of employment. The interviewed workers confirmed that they understood the terms and conditions with the contract. The company does not withhold employee's original identity documents. Only photocopies are taken of identification and stored on the workers' personnel file. No evidence that the company withhold any part of the workers' salaries, benefits, property or documents in order to oblige them to continue working. The payroll records show money is without. The Contract of Employment contains clauses that could lead to forced labour.</p>		Major	<p>The Contracts of Employment contain clauses that are considered as forced labor.</p> <p>1.8- States that the workers should work overtime as requested by the employer and the worker accepts in advance to do overtime as requested by the employer.</p> <p>1.18 The contract states that 270 hours of overtime can be included within the basic wage.</p>	4	08-Sep-20	07-Dec-20	15-Jan-21	Closed	N/A	<p>The contracts are arranged according to the turkish labor law numbered 4857, some articles contain basic information. Because these articles are already pointed out and enforced by the law.</p>	<p>After the ASC audit, this clause that was pointed out to us will be explained in more detail and will be added to the contract.</p>		<p>Root Cause Analysis, Corrective Action and Evidence of new contracts was accepted as sufficient to close this non conformance.</p>
6.4.1	<p><b>Indicator:</b> Evidence of comprehensive<sup>(51)</sup> and proactive anti-discrimination policies, procedures and practices</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There is a policy in place for anti-discrimination. The document reference is 01.IK.PR.08 dated 04/12/2019.</p> <p>There is evidence of equal pay for equal work.</p> <p>Training has been provided to managers and supervisors on diversity and non-discrimination. The training was provided by the HR responsible. The HR responsible has been trained by BSCI and certification was provided. Training was carried out on the 27th August 2020.</p> <p>Training has been provided to workers on anti-discrimination</p> <p>The date of the training was on the 02/06/20</p>		Compliant											
6.4.2	<p><b>Indicator:</b> Number of incidences of discrimination</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	<p>There is no evidence of any discrimination practices and the workers also reported that no discrimination practices are used</p> <p>The company has a process to record discrimination complaints and detailed in the policy and procedures</p> <p>The document reference is 01.IK.PR.08 dated 04/12/2019.</p>		Compliant											
6.5.1	<p><b>Indicator:</b> Percentage of workers trained in health and safety practices, procedures and policies on a yearly basis</p> <p><b>Requirement:</b> 100%</p> <p><b>Applicability:</b> All</p>	<p>There are documented practices, procedures in place. Document reference 01.ISG.PR.14. Dated 21/07/2017. This procedure is the over arching document. There are many procedures, however it was noted that no procedures are available for</p> <p>No procedures could be provided for;</p> <ul style="list-style-type: none"> <li>Control of Electricity- Lock out tag out</li> <li>Control of Noise</li> </ul> <p>There was Health &amp; Safety training carried out on the 08/05/20</p> <p>The Health &amp; Safety training was recorded on document reference number 01.ISG.FR.93 dated 19/01/2018</p> <p>The health &amp; safety training is comprehensive, and a PowerPoint presentation is used to aid the workers. All workers are tested on the training to validate their understanding.</p> <p>There were a number of Health &amp; Safety non-conformances that are listed in the non-conformance section of the report.</p>		Major	<p>COVID procedure issues identified are:</p> <p>The testing for temperature is taken from the arm and not head or behind the ear as described in the operating manual.</p> <p>No recording of the temperatures taken of employees and visitors</p> <p>No training record for the correct use of the temperature device</p> <p>Health &amp; Safety Tour Land base</p> <p>Electric panels were found to be opened and not locked throughout the land base. Some of the panels were noted to be 3 phases.</p> <p>Ropes being used for lifting instead of rated straps</p> <p>Fan and belts on the generator not protected with guards</p> <p>Batteries not secondary contained</p> <p>Handheld grinders with missing guards</p> <p>Harvest Vessel – Crane operator was wearing slippers and not protective footwear.</p> <p>No procedures could be provided for;</p> <ul style="list-style-type: none"> <li>Control of Electricity- Lock out tag out</li> <li>Control of Noise</li> </ul>	5	08-Sep-20	07-Dec-20	03-Jan-21	Closed	N/A	<p>According to the Root Cause Analysis for COVID procedure: Because the COVID is a new situation the required training has not been given because of the COVID spacing situation</p> <p>According to the Root Cause Analysis For Health &amp; Safety Tour: Because the OHS training was long time ago the personnel in charge of these areas have forgotten or neglected what has to be done</p> <p>According to the Root Cause Analysis For Procedures: when the procedures were being written these two were overlooked because of operational blindness</p>	<p>The personnel has been trained in these subjects. They have been warned these subjects are not to be taken lightly and quite important for their safety and health.</p>		<p>Root Cause Analysis, Corrective Action and Evidence was accepted as sufficient to close this non conformance.</p>

6.5.2	<p><b>Indicator:</b> Evidence that workers use Personal Protective Equipment (PPE) effectively</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There is a PPE procedure 01.ISG.PR.03- dated 20.08.2019</p> <p>There are Health and Safety hazards that are listed in the H&amp;S Risk assessment.</p> <p>There is process in place to ensure that the PPE that is provided is appropriate for the operations that's are in place.</p> <p>There was Health &amp; Safety training carried out on the 08/05/20</p>		Compliant																	
6.5.3	<p><b>Indicator:</b> Presence of a health and safety risk assessment and evidence of preventive actions taken</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>Risk Assessment have been established and documented on form 01.ISG.TB14 – dated 03/04/20</p> <p>Workers are trained to identify and prevent known hazards and risks within the annual H&amp;S training as listed above. The risk assessments are used to update procedures as detailed in 6.5.1.</p>		Compliant																	
6.5.4	<p><b>Indicator:</b> Evidence that all health and safety-related accidents and violations are recorded and corrective actions are taken when necessary</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There is an accident procedure – document reference 01.ISG.FR.05</p> <p>There have only been four accidents in the last 12 months. Records were provided for review of the accident.</p> <p>It is clear from the review that procedures for accident recording and investigation have been established.</p>		Compliant																	
6.5.5	<p><b>Indicator:</b> Evidence of employer responsibility and/or proof of insurance (accident or injury) for 100% of worker costs in a job-related accident or injury when not covered under national law</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>All workers are cover 100% by the government for occupational accidents and injuries</p>		Compliant																	
6.5.6	<p><b>Indicator:</b> Evidence that all diving operations are conducted in a manner that protects the health and safety of divers</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>The company keep records of all diving operations. The divers wear watches that log all dives and the information is download from the watches each day. All divers are employed by the company.</p> <p>There is a process in place to ensure that divers have a diving buddy. This was also seen by the auditors during the site tours. All diver certification was provided for review. All medical exams were provided for review.</p>		Compliant																	
6.6.1	<p><b>Indicator:</b> The percentage of workers whose basic<sup>[53]</sup> wage (before overtime and bonuses) is below the minimum wage<sup>[54]</sup></p> <p><b>Requirement:</b> 0 (None)</p> <p><b>Applicability:</b> All</p>	<p>The company have the documentations to show that minimum wage in the country of operation. The wages are paid inline line with the legal requirements. All wages are paid by the hour. Workers are paid each month. The 3 sample months chosen by the audit was January, May and July 2020. All of the payroll information was provided for review.</p>		Compliant																	
6.6.2	<p><b>Indicator:</b> Evidence that the employer is working toward the payment of basic needs wage<sup>[55]</sup></p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>All wages are paid in accordance with the legal requirements and meet the basic needs of all workers.</p>		Compliant																	

6.6.3	<p><b>Indicator:</b> Evidence of transparency in wage-setting and rendering<sup>[54]</sup></p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>Wages and benefits are documented at the point of employment and recorded within the employment contract. All of the sampled workers' contracts contained all of the required information.</p> <p>Pay is communicated to employees before employment commences. The payment time frames and hourly rates are documented within the contract of employment</p> <p>Workers are paid monthly by electronic bank transfer and receive pay statements for each period of remuneration. The pay statements clearly show deductions, gross and net pay.</p> <p>Employees stated during the interview process that they were aware of the wages and benefits that they received and how and when payments were paid. They also confirmed that the pay was monthly.</p>		Compliant																
6.7.1	<p><b>Indicator:</b> Percentage of workers who have contracts</p> <p><b>Requirement:</b> 100%</p> <p><b>Applicability:</b> All</p>	<p>All personnel files contain a Contract of Employment and employees are also provided with a copy of the contract.</p> <p>There is no evidence for labour-only contracting relationships or false apprenticeship schemes being used by Kilic. All of the contracts that are provided are full-time contracts.</p> <p>All workers confirmed that they are given a Contract of Employment, and they signed the contract at the point of recruitment. It was also noted that all employees had been provided with a copy of their contract. The workers confirmed that the contracts are full-time contracts and that labour only contract are not used.</p>		Compliant																
6.7.2	<p><b>Indicator:</b> Evidence of a policy to ensure social compliance of its suppliers and contractors</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>There is a process in place to review the suppliers.</p> <p>For the main suppliers there is a one on site audit carried out by the internal auditors. The auditors have been trained by BSCI for the social principles.</p> <p>For the smaller suppliers there is a questionnaire that is used to evaluate them. The form used is 01.SA.FR.02, but there is no process in place to validate the information provided by the suppliers.</p>	Minor	No process in place to evaluate the smaller suppliers against social standards	6	08-Sep-20	07-Dec-20	03-Jan-21	Closed	N/A	Because we use a high amount of small suppliers they have not been included to the evaluation procedure.	The evaluation process now includes smaller suppliers.								Root Cause Analysis, Corrective Action and Evidence was accepted as sufficient to close this non conformance.
6.8.1	<p><b>Indicator:</b> Evidence of worker access to effective, fair and confidential grievance procedures</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>A clear policy for conflict resolution has been established. Document reference 01.IK.PR.07 Dated 03/10/19</p> <p>The procedure set out how workers are able to raise complaints. There is a process in place for confidential reporting of complaints.</p> <p>The procedure is available in the rest areas for the workers</p> <p>There was also training held on the 02/06/20</p>		Compliant																
6.8.2	<p><b>Indicator:</b> Percentage of grievances handled that are addressed within a 90-day timeframe</p> <p><b>Requirement:</b> 100%</p> <p><b>Applicability:</b> All</p>	<p>There is a process in place to record all complaints. Document 01.IK.YN.02 Dated 05/06/20.</p> <p>The procedure set out the stages of disciplinary and is progressive.</p> <p>The process includes how complaints are dealt with. The procedure states that complaints are dealt with within 6 working days. The company stated that it may take more than 6 days if investigation was required and could take up to 10 working 10 days.</p>		Compliant																
6.9.1	<p><b>Indicator:</b> Incidences of excessive or abusive disciplinary actions</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	<p>A detailed disciplinary policy has been established. The policy ensures that all disciplinarys carried out are not humiliating or negatively impact a worker's physical and mental health or dignity. The disciplinary policy is progressive and is set out in stages.</p> <p>The disciplinary policy ensures that a fair investigation is carried out and that the disciplinary process is consistent.</p> <p>No evidence or allegations of corporal punishment, mental abuse, Physical coercion or verbal abuse during the audit.</p> <p>Workers interviews confirmed that they had no issues with regards to excessive or abusive disciplinary actions. The employees stated that they were aware of the disciplinary policy.</p>		Compliant																

6.9.2	<p><b>Indicator:</b> Evidence of a functioning disciplinary action policy whose aim is to improve the worker</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	A detailed disciplinary procedure is in place. Document reference Document 01.IK.YN.02 Dated 05/06/20. The policy states throughout that its aim is to improve the workers.	Compliant														
6.10.1	<p><b>Indicator:</b> Incidences, violations or abuse of working hours and overtime laws</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>	The legal requirements for working hours and overtime are understood by the company. There are not exceed internationally accepted recommendations (48 regular hours, 12 hours overtime). The workers are working 6 days a week with 1 day off. There are no shift patterns. The workers confirmed there was no abuse of the working hours or overtime regulations	Minor	The contract of employment does not detail the basic working hours	7	08-Sep-20	07-Dec-20	15-Jan-21	Closed	N/A	The contracts are arranged according to the turkish labor law numbered 4857, some articles contain basic information. Because these articles are already pointed out and enforced by the law.	After the ASC audit, this clause that was pointed out to us will be explained in more detail and will be added to the contract.					Root Cause Analysis, Corrective Action and Evidence of new contracts was accepted as sufficient to close this non conformance.
6.10.2	<p><b>Indicator:</b> Overtime is limited, voluntary, paid at a premium rates and restricted to exceptional circumstances</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	There are premium rates in place for overtime. Overtime does not happen very often. The workers stated that the overtime was voluntary and the clauses for forcing overtime within the Contract of Employment have never been used.	Major	The contract does not detail the overtime premiums that workers are entitled to.	8	08-Sep-20	07-Dec-20	15-Jan-21	Closed	N/A	The contracts are arranged according to the turkish labor law numbered 4857, some articles contain basic information. Because these articles are already pointed out and enforced by the law.	After the ASC audit, this clause that was pointed out to us will be explained in more detail and will be added to the contract.					Root Cause Analysis, Corrective Action and Evidence of new contracts was accepted as sufficient to close this non conformance.
6.11.1	<p><b>Indicator:</b> Farm employees accommodated on the farm have access to clean, sanitary, safe and suitable living conditions</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	There is accommodation on site for security workers only. The accommodation was checked and meets the full living requirements.	Compliant														
6.11.2	<p><b>Indicator:</b> Existence of separate sanitary and toilet facilities for men and women; with the exception of work sites where married couples are working and accommodated together</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All farms and accommodation and worksites except as permitted exclusions (6.11.2a).</p>	There are only male security workers and clean bathrooms and toilets are available within the living areas.	Compliant														
7.1.1	<p><b>Indicator:</b> Evidence of regular and meaningful consultation and engagement with community representatives and organizations</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	No documented consultations with the local community to discuss the impact of the farm operations and the ASC requirements could be provided.	Major	There are no documented consultations with the local community to discuss the impact of the farm operations and the ASC requirements.	9	08-Sep-20	07-Dec-20	15-Jan-21	Closed	N/A	A proper time could not be found which all stakeholders could attend to the meeting.	Consultation meetings which all stakeholders could attend will try to be arranged in the future.					Root Cause Analysis, Corrective Action and Evidence was accepted as sufficient to close this non conformance.

7.1.2	<p><b>Indicator:</b> Presence and evidence of an effective<sup>[63]</sup> policy and mechanism for the presentation, treatment and resolution of complaints by community stakeholders and organizations</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	No representatives from the local community requested to be part of the audit process. No interviews performed by the auditor	Minor	The stakeholder's complaints are not being recorded in the company QDMS systems.	10	08-Sep-20	07-Dec-20	03-Jan-21	Closed	N/A	Stakeholder's complaints are very few and and rare as such it has not been needed to be uploaded to the QDMS system.	Stakeholder's complaints will be added to the Complaints procedure and they will be uploaded to the company QDMS system.	Root Cause Analysis, Corrective Action Plan and Evidence of revised procedure was accepted as sufficient to close this non conformance.
7.1.3	<p><b>Indicator:</b> For new farms<sup>[64]</sup>, evidence of engagement and consultation with surrounding communities about potential social impacts from the farm.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All new farms (see note).</p>	N/A – The farm does not meet the definition of a new farm.	N/A	N/A – The farm does not meet the definition of a new farm.									
8.1	<p><b>Indicator:</b> Presence of documents issued by pertinent authorities proving compliance with local and national authorities on land and water use, effluent regulations and use of treatments.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>There are no changes for 2020, copies of business permits and land title from each supplier of the following hatcheries:</p> <ul style="list-style-type: none"> <li>-Akarca Kuluckahane Adaptasyon Tesisi, license as B48130378. Turbot and sole include but not in use.</li> <li>-Bafa Kuluckahane Adaptasyon Tesisi license as B0913.0020</li> <li>-Ozbaser Adaptasyon Tesisi license as B48050350</li> </ul> <p>Kilic presented hatcheries discharge permit as:</p> <ul style="list-style-type: none"> <li>-Akarca Kuluckahane Adaptasyon Tesisi, B48130378 and effluent as 217 l/sec</li> <li>-Bafa Kuluckahane Adaptasyon Tesisi B0913.0020 and effluent as 1427 l/sec</li> <li>-Ozbaser Adaptasyon Tesisi B48050350, and effluent as 145 l/sec</li> </ul> <p>Treatment records mentioned in point 5.2.5 of this report</p> <p>Suppliers water extraction permit requirement presented, and compliance demonstrated in effluent samples.</p>	Compliant										
8.2	<p><b>Indicator:</b> New introductions of exotic species from the date of publication of the Sea Bass/Sea Bream Standard, unless the hatchery/fingerling facility is a closed production system.</p> <p><b>Requirement:</b> None.</p> <p><b>Applicability:</b> All.</p>	<p>All hatcheries, Akarca, Bafa and Ozbaser (owned by Kilic) ; are open flow as confirmed in operation permits. FAO webpage was presented to demonstrate presence bass and bream in the area where the hatcheries are located.</p> <p>Bass and bream are mainly produced in the hatcheries. The list of species for is hatchery is as follows according to their operational permits:</p> <ul style="list-style-type: none"> <li>European Seabass (<i>Dicentrarchus labrax</i>)</li> <li>Giltthead Seabream (<i>Sparus aurata</i>)</li> <li>Meagre (<i>Argyrosomus regius</i>)</li> </ul> <p>Turbot and sole are included in Akarca but they are not used</p> <p>All confirmed as Mediterranean species in the FAO web page and fish base web page.</p> <p>C is N/A species under culture are not exotic.</p>	Compliant										
8.3	<p><b>Indicator:</b> Allowance for siting in National Protected Areas.</p> <p><b>Requirement:</b> None.</p> <p><b>Applicability:</b> All</p>	<p>There are no changes since initial certification; the hatcheries Akarca, Bafa and Ozbaser. are not located in National Protected areas.</p> <p>This is also specifically covered by GGAP certification, and the 3 hatcheries are GGAP certified; and inspected by the same technical expert member of this audit team. Certificates confirmed as valid with LR in 2020.</p>	Compliant										
8.4	<p><b>Indicator:</b> Evidence that the egg and fingerling producer must have an equivalent or better health status than that of the grow-out facility, and must follow all national and local (jurisdictional) guidance on disease management.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>All hatcheries are owned and managed by Kilic. In Turkey the requirement to show officially that fish are of good health status generally applies to inter site and not onsite movements within the same farm license. So, t official vet oversight and movement permissions are need and presented in traceability exercises.</p> <p>It was possible to confirm a written procedures as included in hatcheries biosecurity procedures 01.ISG.FR.46.</p> <p>The hatchery veterinary was interviewed and confirmed that all hatcheries are in category one health status.</p> <p>There are no changes since initial certification.</p>	Compliant										

8.5	<p><b>Indicator:</b> Evidence of disclosure to the grow-out farm of all chemical and antibiotic treatments on eggs and fry, including the reason for their use and the quantity used.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>Treatments on the fish supplied to the site confirmed as following substances used in 2019 harvested fish, tetracycline 107 kg, Sulfadiazine-trimethoprim 15 kg and sulfamethoxazole-trimethoprim 9 kg. The vet stated that only one treatment of the above mentioned substances is used per batch, which is considered credible as fish will only stay at the hatchery until the 10 to 15 grams approx.</p>	Compliant																	
8.6	<p><b>Indicator:</b> Allowance for the use of therapeutic treatments, including antibiotics or other treatments, that are banned under European Union (EU) law or listed as critically important for human medicine by the World Health Organization.</p> <p><b>Requirement:</b> Not permitted.</p> <p><b>Applicability:</b> All.</p>	<p>Hatchery suppliers presented their list of forbidden substances; confirmed as included in hatchery FHMP, reference code 02-B5-PL-03. No WHO CIA detected in the list of chemicals mentioned above.</p>	Compliant																	
8.7	<p><b>Indicator:</b> Presence of a fish health management plan implemented in agreement with the facility's designated veterinarian or fish health specialist</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>FHMP presented from each fingerling supplied; the 3 hatcheries are owned by Kilic, the document is prepared by vet Yeti Seferoaglu; reference code 02-B5-PL-03F Presented documents are confirmed to be signed by veterinary and management Akarca, Bafa and Ozbaser, review date 2-1-20. Yeti was interviewed during the September inspection and all information was consistent with the content of this report.</p>	Compliant																	
8.8	<p><b>Indicator:</b> Evidence of company-level policies and procedures that demonstrate the company's commitment to each of the 8 key ILO labor issues described in Principle 6.</p> <p><b>Requirement:</b> Yes.</p> <p><b>Applicability:</b> All.</p>	<p>There are no changes since initial certification, Akarca, Bafa and Ozbaser company-level policies and procedures presented as part of the Kilic global GAP declaration. Commitment to address each of the 8 key ILO labour issues confirmed as included in the Kilic Global GAP ILO declaration.</p>	Compliant																	
8.9	<p><b>Indicator:</b> Evidence of regular communication, engagement and consultation with surrounding communities</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>	<p>For 2020, evidence of meetings presented as performed in 20-01-2020; including the several companies in the area with a total of 7 signatures of company managers. See reference with non-conformity raised in principle 7 of this report.</p>	Compliant																	

Non Conformity closure delay Seabass, Seabream, Meagre

This field is automatically filled out in case of a delayed NC closure

Indicator	Evaluation	NC reference number	Date request for delay received	Justification for delay	Next deadline	Request evaluation by CAB	Date request approved or declined
1.1.1	Compliant	FALSE					
1.1.2	Compliant	FALSE					
1.1.3	Compliant	FALSE					
1.1.4	Compliant	FALSE					
2.1.1	Compliant	FALSE					
2.1.2	Minor	1	12-Jan-21	The tests are being re-done by the lab.	06-Sep-21	As this non-conformity requires sampling at peak biomass, LR can justify granting an extension to a maximum of 12 months.	18-Jan-21
2.1.3	Compliant	FALSE					
2.1.4	N/A	FALSE					
2.2.1	Compliant	FALSE					
2.2.2	Compliant	FALSE					
2.2.3	Minor	FALSE					
2.2.4	Compliant	FALSE					
2.3.1	Compliant	FALSE					
2.3.2	Compliant	FALSE					
2.3.3	Compliant	FALSE					
2.4.1	Compliant	FALSE					
2.4.2	Compliant	FALSE					
2.4.3	Compliant	FALSE					
2.4.4	Compliant	FALSE					
2.4.5	N/A	FALSE					
3.1.1	Compliant	FALSE					
3.2.1	Compliant	FALSE					
3.3.1	Compliant	FALSE					
3.3.2	Compliant	FALSE					
3.3.3	Compliant	FALSE					
3.3.4	Compliant	FALSE					
3.3.5	Compliant	FALSE					
3.4.1	Compliant	FALSE					
3.4.2	Compliant	FALSE					
3.4.3	Compliant	FALSE					
3.4.4	Compliant	FALSE					
3.4.5	Compliant	FALSE					
4.1.1	Compliant	FALSE					
4.2.1	Compliant	FALSE					
4.2.2	Compliant	FALSE					
4.3.1	Compliant	FALSE					
4.3.2	Compliant	FALSE					
4.3.3	Compliant	FALSE					
4.3.4	Compliant	FALSE					
4.4.1	Compliant	FALSE					
4.4.2	Compliant	FALSE					
4.4.3	Compliant	FALSE					
4.5.1	Minor	FALSE					
4.5.2	Compliant	FALSE					
4.5.3	Compliant	FALSE					
4.5.4	Compliant	FALSE					
4.5.5	Compliant	FALSE					
4.6.1	N/A	FALSE					
4.6.2	N/A	FALSE					
4.6.3	N/A	FALSE					
4.6.4	N/A	FALSE					
5.1.1	Compliant	FALSE					
5.1.2	Compliant	FALSE					
5.2.1	Compliant	FALSE					
5.2.2	Compliant	FALSE					
5.2.3	Compliant	FALSE					
5.2.4	Compliant	FALSE					
5.2.5	Compliant	FALSE					
5.3.1	Compliant	FALSE					
5.3.2	Compliant	FALSE					
5.3.3	Compliant	FALSE					
5.3.4	Compliant	FALSE					
6.1.1	Compliant	FALSE					
6.1.2	Compliant	FALSE					
6.1.3	Compliant	FALSE					
6.2.1	N/A	FALSE					
6.2.2	N/A	FALSE					
6.3.1	Major	FALSE					
6.4.1	Compliant	FALSE					
6.4.2	Compliant	FALSE					
6.5.1	Major	FALSE					
6.5.2	Compliant	FALSE					
6.5.3	Compliant	FALSE					
6.5.4	Compliant	FALSE					
6.5.5	Compliant	FALSE					
6.5.6	Compliant	FALSE					
6.6.1	Compliant	FALSE					
6.6.2	Compliant	FALSE					
6.6.3	Compliant	FALSE					
6.7.1	Compliant	FALSE					
6.7.2	Minor	FALSE					
6.8.1	Compliant	FALSE					
6.8.2	Compliant	FALSE					
6.9.1	Compliant	FALSE					
6.9.2	Compliant	FALSE					
6.10.1	Minor	FALSE					

**Non Conformity closure delay Seabass, Seabream, Meagre**

6.10.2	Major	FALSE					
6.11.1	Compliant	FALSE					
6.11.2	Compliant	FALSE					
7.1.1	Major	FALSE					
7.1.2	Minor	FALSE					
7.1.3	N/A	FALSE					
8.1	Compliant	FALSE					
8.2	Compliant	FALSE					
8.3	Compliant	FALSE					
8.4	Compliant	FALSE					
8.5	Compliant	FALSE					
8.6	Compliant	FALSE					
8.7	Compliant	FALSE					
8.8	Compliant	FALSE					
8.9	Compliant	FALSE					



**ASC Audit Report - Traceability**

10	Traceability Factor	Description of risk factor if present.	Describe any traceability, segregation, or other systems in place to manage the risk.
10.1	The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, produced within the same operation.	No opportunities of mixing or substitution of certified with non-certified products have been identified either prior to or at harvesting as the whole farm site is within the unit of certification. The main risk identified happens after harvest and during transportation to the processing plant as there are other farms in the Mandalya Gulf area. Every harvest tank is closed and marked with an individual zip ties, which includes a Id number. Harvest was witnessed and adequate practices are confirmed as implemented but is noted that harvest weight is estimated and counting happens at the processing facility.	Excel and documents are used as tracking of stock information from hatchery of origin to the point of sale at the processing plant located in Bodrum area and managed by Kilic.
10.2	The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, present during production, harvest, transport, storage, or processing activities.	The auditor considers the opportunity to substitute certified with non-certified product throughout the processing activities is limited. But there are other non-certified facilities near the site. All finished product can be traced back to the farm and cage of origin by a unique identifier on the label. Kilic has a system of harvest records that should be tested during the chain of custody.	New software Kilic aqua Fishtime, Excel and documents are used as tracking of stock information from hatchery of origin to the point of sale at the processing plant located in Bodrum area and managed by Kilic.
10.3	The possibility of subcontractors being used to handle, transport, store, or process certified products.	The specialised harvesting vessel used is owned by Kilic, harvest was witnessed and confirmed that every harvest is transported at one time. All other activities within the processing system are also fully controlled by Kilic up to the point of sale.	New software Kilic aqua Fishtime, Excel and documents are used as tracking of stock information from hatchery of origin to the point of sale at the processing plant located in Bodrum area and managed by Kilic.
10.4	Any other opportunities where certified product could potentially be mixed, substituted, or mislabelled with non-certified product before the point where product enters the chain of custody.	None identified.	New software Kilic aqua Fishtime, Excel and documents are used as tracking of stock information from hatchery of origin to the point of sale at the processing plant located in Bodrum area and managed by Kilic.

	Owned by client	Subcontracted by client
10.4.a Total number of sites owned/subcontracted by client producing the same species that is included in the scope of certification	1	n/a
Number of sites included in the unit of certification	1	n/a
	Site name(s)	Reason(s)
10.4.b Site(s) within UoC that has product to be excluded from entering the chain of custody	n/a	n/a

10.5 Detail description of the flow of certified product within the operation and the associated traceability system which allows product to be traced from final sale back to the unit of certification

The fish held at the Kilic site Orfoz are covered by ASC Certification, and harvest was witnessed during initial audit. These fish are harvested using a dry brail and moved aboard a vessel owned by Kilic in individual 600 litre tanks. Then fish are transported to the Kilic processing facility. All activities are fully controlled by Kilic using primarily excel files and harvest documents, logging fish origin by cage through the process.

**10.6 Traceability Determination:**

10.6.1 The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation originate from the unit of certification, or

The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation are originated from the unit of certification. Farm and cages traceability should be tested during the chain of custody audit.

10.6.2 The traceability and segregation systems are not sufficient and a separate chain of custody certification is required for the operation before products can be sold as ASC-certified or can be eligible to carry the ASC logo.

See above.

10.6.3 The point from which chain of custody is required to begin

The chain of custody is required to begin at the point fish are delivered to the processing plant.

10.6.4 If a separate chain of custody certificate is required for the unit of certification

No, there is a separate CoC certificate for the Kilic processing plant

**For Multi-site clients**

## ASC Audit Report - Closing

### 12 Evaluation Results

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

Harvesting was been witnessed at initial audit, and it was satisfactory.

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

The audit team are of the opinion that the unit of certification has the capability to meet the objectives of the ASC Bass and Bream Standard.

12.3 In cases where BEIA or PSIA is available, it shall be added in full to the audit report. IF these documents are not in English, then a synopsis in English shall be added to the report.

N/A

### 13 Decision

13.1 Has a certificate been issued? (yes/no)

Yes

13.2 The Eligibility Date (if applicable)

N/A

13.3 Is a separate CoC certificate required for the producer? (yes/no)

Yes, at their Kilic packing operation in Bodrum.

13.4 If a certificate has been issued this section shall include:

13.4.1 The date of issue and date of expiry of the certificate.

Valid From: 06/09/2019, Valid To: 05/09/2022

13.4.2 The scope of the certificate

All bass and bream produced in the site Kilic Orfoz Deniz Balıkları Yetistiriciligi Projesi, owned by Kılıç Deniz Ürünleri Üretim İth. İhr Tic. A.S.

13.4.3 Instructions to stakeholders that any complaints or objections to the CAB decision are to be subject to the CAB's complaints procedure. This section shall include information on where to review the procedure and where further information on complaints can be found.

Complaints, objections, comments or submissions of further information may be passed to Acoura Marine Ltd. t/a Lloyd's Register either during the public comment period or afterwards throughout the validity of the certificate. This can be done via the Lloyd's Register website ([www.acoura.com](http://www.acoura.com)), by email ([asc-ca@lr.org](mailto:asc-ca@lr.org)) or by mail (Aquaculture Team, Lloyd's Register, 6 Redheughs Rigg, Edinburgh, UK). For complaints, please refer to Lloyd's Register's website ([www.acoura.com](http://www.acoura.com)) for the complaints procedure within Lloyd's Register's Certification Regulations document. For other objections, comments or submissions, these will be passed on to the Lead Auditor and Aquaculture Director for consideration and decision on any necessary action. Complaints may also be submitted directly to the ASC at [certification@asc-aqua.org](mailto:certification@asc-aqua.org), PO Box 19107, 3501 DC Utrecht, The Netherlands or NHK Utrecht Centraal, Arthur van Schendelstraat 650, 3511 MJ Utrecht, The Netherlands. ASI's dispute mechanism can be found on their website ([www.asi-assurance.org/](http://www.asi-assurance.org/)) which includes information on the handling of incidents, complaints and appeals.

## 14 Surveillance

### 14.1 Next planned Surveillance

14.1.1 Planned date Jul-21

14.1.2 Planned site Kilic Orfoz Deniz Baliklari Yetistiriciligi Projesi, owned by Kılıç Deniz Ürünleri Üretim İth. İhr Tic. A.S.

### 14.2 Next audit type

14.2.1 Surveillance 1 No

14.2.2 Surveillance 2 Yes

14.2.3 Re-certification No

14.2.4 Other (specify type) N/A