



September 6, 2018

Chris Ninnes
CEO
Aquaculture Stewardship Council
HNK, Arthur van Schendelstraat 650
3511 MJ Utrecht
The Netherlands

David Agnew
Science & Standards Director
Marine Stewardship Council
1 Snow Hill
London EC1A 2DH
United Kingdom

Re: ASC-MSC Seaweed Standard

Dear Mr. Ninnes and Mr. Agnew,

Thank you for your reply to Marinalg International's letter regarding the ASC-MSC Seaweed (Algae) Standard, which was approved for release on November 22, 2017 and became effective March 1, 2018. We appreciate the feedback by ASC and MSC which indicates the two parties' desire to develop standards that meet the needs of all interested stakeholders. Marinalg also appreciates the efforts by ASC and MSC to continue developing processes to improve the Standard and address anticipated barriers, including the costs of certification and complexity of the Standard itself.

We are aware that Marinalg members were involved in the Seaweed Standard Committee (SSC), formed as the ASC-MSC governance body responsible to manage all aspects of the Standard, in various observer roles. As your reply indicated that ASC and MSC would like to continue dialogue with Marinalg to discuss options to address the issues raised in our earlier letter, Marinalg would appreciate the opportunity to revisit questions and concerns originally expressed through the SSC which were not addressed in the Standard. It is our understanding that Marinalg representatives expressed concerns over the scope and intended use of the ASC-MSC Seaweed Standard, noting that hydrocolloid extracts are a mere three percent of the entire seaweed industry and make up approximately one percent of end products such as food, beverages and other consumer products. It was also highlighted that the final hydrocolloid material in an end product is a blend of not only seaweed extracts from multiple locations, but also a variety of seaweed species, thus calling into question the need or importance of certifying what would be a fraction of the hydrocolloid material in a product.

As an association representing manufacturers of seaweed-derived hydrocolloids, we are well aware of the considerable differences between the production processes and related markets of seaweed-derived hydrocolloids versus those of whole seaweed intended for direct use in foods or direct consumption by consumers. In addition to the differences in production process and markets, whole seaweed and hydrocolloids are fundamentally different categories of food. Hydrocolloids are food ingredients which are never consumed directly and go through additional processing steps in combination with other inputs and ultimately make up less than one percent of the finished food. It is highly unlikely a food manufacturer would care to label the presence of a hydrocolloid that makes up such a small percentage of the final product, or would have space on their product to make such a claim. In addition, in many food applications, multiple hydrocolloids are blended together, meaning it is typically not just one hydrocolloid

used or included in the ingredient list. As such, the ability to trace what would be a small fraction of a blended ingredient and thus achieve the Standard would present a uniquely difficult challenge to hydrocolloid production, especially in the case of blends which are commonly produced by this industry. It is also very unlikely that a manufacturer would seek certified seaweed-derived hydrocolloids if they are used in a blend of hydrocolloids which are not certified.

Further, the hydrocolloid industry is already subject to policies to ensure safe and sustainable practices such as Hazard Analysis and Critical Control Points (HAACP) requirements and regional best practices for farmers of seaweed used in hydrocolloid production, such as the Good Seaweed Aquaculture Practice in Indonesia known as CBIB RL, on which more details can be found in the attached executive summary. Although Marinalg's representative on the SSC indicated some of these concerns in the development of the Standard and requested a potential exemption for the hydrocolloid industry, the final Standard does not clearly identify the Standard's intended audience, which has created confusion among the producers and users of hydrocolloids and has presented a potential threat to disrupt the industry.

Based on these comments, Marinalg would like to recommend that ASC and MSC limit their Standard to the production and labeling of whole processed seaweed in order to avoid confusion by producers and seaweed farmers, specifically those in the hydrocolloid industry which face different production practices, users, and consumer markets. I am happy to address any questions you may have and would welcome continued joint efforts to define the scope of the Standard.

Sincerely,

A handwritten signature in black ink that reads "Robert Rankin". The signature is written in a cursive, flowing style.

Robert Rankin
Executive Director
Marinalg International