

U.S. Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program)

2024 Annual Report

Brief History of Development of the Program

The efforts by Catfish Farmers of America (CFA) to identify a rigorous and applicable environmental sustainability certification program that provides the accountability desired by buyers and consumers began 16 years ago in 2009. Following discussions internally and with retailers, CFA initiated discussions with the Global Aquaculture Advocate (now the Global Seafood Alliance) Best Aquaculture Practices (GAA-BAP) program in late 2015. A committee was formed of catfish growout and hatchery producers, processors, and feed mill representatives that had a series of meetings with GAA-BAP staff and consultants from late 2015 into early 2017. However, it became clear that the GAA-BAP standards were developed primarily for aquaculture businesses in other countries, and evidence began to mount of continued negative environmental effects in other countries despite certification. Additional concerns emerged related to potential conflicts of interest stemming from board members representing companies that were certified and that farms and other audited businesses paid auditors directly for travel and other fees. As a result, CFA began to search for a more rigorous and credible 3rd-party certification program that avoided such inherent conflicts of interest. A survey of US catfish processors conducted in 2019 showed substantial interest in a 3rd-party audited environmental sustainability program.

CFA became aware of the USDA-Processed Verified Program (USDA-PVP) in early 2021 and initiated an effort to assess whether it would provide the rigorous, 3rd-party verification of environmental sustainability that it sought. Efforts included a series of meetings with USDA officials and CFA members to develop the standard for the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program. The standard underwent four reviews with final approval for inclusion of the CFA Sustainability Standard in the USDA-PVP Program in May, 2022. Several catfish businesses began to work on the required Quality Management System and its accompanying manual to prepare for application to the USDA-PVP Program.

First U.S. Catfish Company Approved for Participation in the Catfish Sustainability Program

The first approval of a company to participate in the USDA-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program) was announced in June, 2024. The approval was granted based on successful outcomes of a desk audit that was followed by a series of on-site audits of the processor, growout farms, hatcheries, and feed mills that participate in that processor's supply chain. Consolidated Catfish, Inc., is now listed on the USDA-PVP website (<https://www.ams.usda.gov/sites/default/files/media/Official%20ListingPVP.pdf>) and has been approved to use the USDA-PVP Shield on all packaging.

Activities

The CFA was involved through a series of meetings with USDA-PVP managers throughout the development and approval of the US Catfish Sustainability Standard. The primary contact and clarifications related to the audits conducted for the Catfish Sustainability Program has been with the National Field Operations Supervisor of USDA-PVP and the Branch Chief of the USDA Quality Assessment Division (USDA-QAD).

With the first catfish company approval, CFA has begun to institutionalize the structure of the US Catfish Sustainability Program. In the earlier years, the interactions with catfish processors, growout and hatchery farmers and feed mill representatives were through reports to the CFA Board, email correspondence, and telephone conversations. Now that the US Catfish Sustainability Program has officially begun, a formal CFA Standards Committee has been formed to provide oversight over the program. The CFA Standards Committees includes representation from the four major catfish-producing states. In addition to technical experts, the Standards Committee includes processors, growout and hatchery farmers. A detailed Quality Manual and Operating Procedures document has been developed to provide details and structured guidance on the program. The 2024 Standards Committee includes the following:

Dr. Carole Engle, Chair (Virginia)
Dr. Jimmy Avery (Mississippi)
Dr. Luke Roy (Alabama)
Brad Graham (Arkansas farmer/Mississippi processor)
Townsend Kyser (Alabama farmer)
Brad Phillips (Mississippi hatchery/farmer)
Jason Guidry (Louisiana Processor, Mississippi & Alabama Farmer)
David Allen (Mississippi processor/farmer)

Feedback and comments received from US catfish processors indicated that, while many of their customer contacts have strong interest in purchasing product with the USDA PVP shield for catfish, various retailers have begun to require that suppliers use a certification program that has been benchmarked against the Global Seafood Sustainability Initiative (GSSI) Tool that indicates alignment with the various components of the tool. Over the past year, CFA has been in conversations with GSSI to discuss the possibility of GSSI benchmarking of the US Catfish Sustainability Program. One clear difference between the US Catfish Sustainability Program and other certification programs is that the Certification Body and the Accreditation Body are both US federal government agencies that operate under rules and procedures dictated by US federal laws, and not the NGOs that provide Certification and Accreditation services for other certification programs. The discussions between CFA and GSSI were productive and it appears that there may be a pathway for alignment of the US Catfish Sustainability Program with the GSSI Benchmarking Tool.

CFA entered into a contract with the Global Seafood Sustainability Initiative in July, 2024 to enter into a Pre-Assessment phase that includes the initial steps towards seeking full recognition of alignment of the US Catfish Sustainability Program with the GSSI Benchmarking Tool.

Outcomes

The primary outcome to date has been the initiation of the US Catfish Sustainability Program with the June, 2024, approval of a major U.S. catfish processor and their supply chain partners into the USDA-PVP program.

Impacts

It is too early to measure impacts of the program, given that the first company has been accepted into the program only this year, in June, 2024. The Quality Manual and Operating Procedures document outlines monitoring and evaluation activities for the program.

Annual Management Review

Overall Performance in 2024

The Quality Manual and Operating Procedures document identifies performance indicators for the US Catfish Sustainability Program.

USDA PVP Audits and Auditors

USDA auditors were trained on the US Catfish Sustainability Standard and completed the desk and on-site audits of a processor, farms, hatchery, and feed mill that led to the approval of the first company to be enrolled in the USDA program.

Stakeholder Comments for Future Versions of the Standard

The US Catfish Sustainability Program is the outcome of requests from stakeholders, primarily US catfish processors, supported by survey data, to develop a sustainability initiative for the industry. US catfish processors, growout farmers, hatchery farmers, and feed mill representatives have been engaged in the various efforts to develop such a program, from 2009 to the present. Reports on the sustainability initiative have been presented to the CFA Board since 2016 and assistance has been provided to individual processing, farm, and feed mill businesses by responding to questions, and providing guidance on the Quality Management System and Manual that is required for each applicant to the US Catfish Sustainability Program.

CFA is committed to seeking continuous improvement and it is anticipated that revisions to the Standard will be made in the future. The Quality Manual and Operating Procedures document specifies that the Standard will be reviewed at least every 5 years and more often if the Standards Committee deems it necessary.

A process has been created to provide opportunity for stakeholders to provide more formal comments for improvement to the Standard than in the past. This process is detailed in the Quality Manual and Operating Procedures document.

Notifications to Stakeholders

The CFA membership receives notifications from the US Catfish Sustainability Program through email messages, articles and notices in The Catfish Journal, reports to the CFA Board of Directors, and reports at the annual membership meeting.

Comments Received from Stakeholders, Responses, Changes to Standard

The comments received to date related to the US Catfish Sustainability Program have come from interested stakeholders who have expressed interest in the program and who provide on-going advice to CFA. The resulting Standard and implementation of the US Catfish Sustainability Program have been developed substantially from the input received. Now that the first company has been approved and is participating in the US Catfish Sustainability Program, a more formal process for stakeholders to provide comments has been developed and is detailed in the Quality Manual and Operating Procedures document developed in 2024 for the program.

Transparency

A mechanism has been created for interested stakeholders to request information on the program. The mechanism is specified in the Quality Manual and Operating Procedures document for the Catfish Sustainability Program. The Standard, along with a link to submit questions and comments will be posted at <https://uscatfish.com/sustainability>).

Document Control

Documents of the US Catfish Sustainability Program are controlled by the CFA home office where all records are maintained. These records include the Standard, the Quality Manual and Operating Procedures, the Annual Reports, the Complaint Log and Response Form, the Public Comment Log and Response Form, and the Form to Request Additional Information. Each of these documents is the first approved version, given that the program began in 2024. Subsequent revisions will be made in the future following the mechanisms and processes detailed in the Quality Manual and Operating Procedures.

Table 1. Performance Indicators for the Catfish Sustainability Program, 2024.

Performance indicator	Number
Businesses approved to participate in the program	
Processors (no.)	1
Farms (no.)	109
Feed mills (no.)	6
Hatcheries (no.)	12
Number of desk audits, new applicants in last year (no.)	1
Number of on-site audits	
Initial audits (no.)	1 company + random sample of supply chain partners
Surveillance audit (no.)	None to date
Renewal annual audits (no.)	None to date