



Consolidated Catfish Producers, LLC Sustainability Certification Program

The commitment of Consolidated Catfish Producers, LLC to the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program is outlined in the company's Quality Policy as follows:

Consolidated Catfish Producers, LLC is dedicated to consistently meeting our customers' needs by processing environmentally sustainable U.S. farm-raised catfish. Our policy is to provide customers with catfish products that uphold our commitment to environmental sustainability. We aim to achieve our environmental sustainability goals by implementing and maintaining this Quality Management System that complies with the USDA Process Verified Program requirements. Consolidated Catfish Producers LLC's management and staff are responsible for the Quality Management System. We seek continuous improvement through periodic reviews, customer feedback, and cooperation with our supply chain farm, hatchery, and feed mill partners. Our Quality Management System outlines the policy, organization, and procedures necessary to achieve the required standards.

The management team and structure of Consolidated Catfish Producers, LLC consists primarily of:

CEO
V.P. Sustainability
Director of Quality Assurance

In 1993, Consolidated Catfish Producers blazed a trail in the catfish industry by becoming the first company to voluntarily implement the United States Department of Commerce Hazard Analysis Critical Control Points (HACCP) program. This program, which covers Food Safety and Sanitation requirements, was audited daily, and the HACCP-trained US Department of Commerce (USDC) inspectors reviewed records monthly, ensuring our commitment to quality and safety.

On January 11th, 2018, our company received a United States Department of Agriculture Food Safety and Inspection Service (USDA) grant of inspection. The HACCP plan continues, and the facility continues to be inspected daily by the USDA.

We are thrilled to announce a significant milestone for Consolidated Catfish Producers. We are now the first company in the Catfish Industry to achieve certification in the U.S. farm-raised environmental sustainability certification program. This achievement is a testament to our dedication to our industry, growers, and customers and our commitment to providing safe, wholesome, and sustainable products.

U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

The U.S. Catfish industry is committed to producing the highest-quality products in an environmentally responsible manner—however, a quality management system for environmental sustainability needs to exist for U.S. catfish farms. Some environmental sustainability components related to U.S. catfish farming are regulated, but others are not. Yet customers of catfish farms and processors are increasingly asking for verification. At Consolidated Catfish Producers, LLC, we raise U.S. catfish in an environmentally sustainable manner.

The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program requires each approved company to develop and implement a detailed quality management system for U.S. catfish production that customers are explicitly requesting, and that will convey specific information to consumers regarding the environmental sustainability of U.S. catfish. The particular process points to be verified are those components of environmental sustainability that are not regulated. These include:

1. Fishmeal and fish oil conservation
2. Protection of wild fish stocks using only domesticated, farm-raised fry and fingerlings.

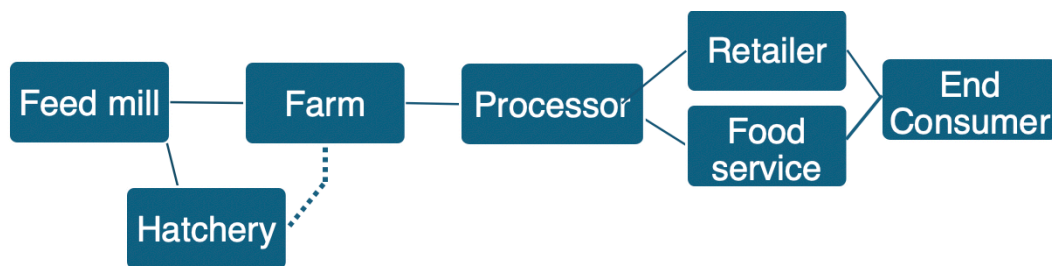
The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program acknowledges that U.S. laws and regulations assure that U.S. catfish farmers conform to the following:

1. Adherence to the USEPA Effluent Limitation Guidelines (USEPA 2004a, b, c, d; 2006).
2. Adherence to EPA spill prevention and control as related to farm supplies and wastes (USEPA 2020a).
3. Adherence to EPA laws and regulations related to chemical handling (USEPA 2020b).
4. Management of fish-eating birds according to the U.S. Fish and Wildlife Service permitting requirements (USDA-APHIS-Wildlife Service 2020).
5. Critical habitat under the Endangered Species Act (U.S. Fish and Wildlife Service 2020).

The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program standard for catfish production clearly defines responsible environmental stewardship for catfish producers who choose to reduce environmental impacts further, improve management practices, and provide greater accountability to their buyers and the public. The program requires that individual farms develop a quality management system for environmental sustainability.

This quality management system includes Consolidated Catfish Producers, LLC, and supply chain partners, including farms, hatcheries, and feed mills. The processor purchases catfish from farms, some of which have their own hatcheries, but others buy fingerlings (small fish used for stocking into grow-out ponds) from hatcheries. Both farms and hatcheries purchase feed from feed mills (Figure 1).

Figure 1. Supply chain partners for the Quality Management system and interactions



Process Verified Points:

In this Quality Management System, the processor's responsibility is to ensure that their farm, hatchery, and feed mill partners are in full compliance with the process-verified points related to 1) fishmeal and fish oil conservation and 2) protection of wild fish stocks by using only domesticated, farm-raised fry and fingerlings. The processor is responsible for requesting annual letters from their hatchery and feed mill suppliers that attest to the conformance of fry/fingerlings and feed to the process-verified points.

Catfish Processor Standard: Process Verified Points

Fishmeal and fish oil conservation

Protection of wild fish stocks by using only domesticated, farm-raised fry and fingerlings.

Fishmeal and Fish Oil Conservation

The processor requires farmers to provide information annually regarding the feed mill(s) used to purchase fishmeal/fish oil and the tonnage purchased. The feed mill(s) will provide annual

declaration letters specifying the percent of wild fishmeal and fish oil used in the feeds for the past year before purchasing fish.

Use of Fry or Fingerlings from the Wild

The processor requires farmers to provide information annually regarding the hatchery(s) used to purchase fry/fingerlings. The hatchery(s) will provide annual declaration letters indicating that the fry/fingerlings supplied to the farmers were raised on farms or in hatcheries and not captured from the wild.

4.2 Process Verified Points

The processor purchases catfish from farms, some of which have hatcheries, but others buy fingerlings (small fish used for stocking into grow-out ponds) from hatcheries. Both farms and hatcheries purchase feed from feed mills.

Review of requirements

The periodic management review conducted as part of this Quality Management system includes a review of all customer and regulatory requirements. Any modifications or changes to the quality management system needed because of the management review are reported and recommended to the company's overall management team.

Other instructions:

The company website for our sustainability program allows customers to add comments and complaints, and our annual customer survey provides continuous feedback from our customers.

Process Verified Points	Standard	Compliance record-keeping
Catfish Processor		
1. Fishmeal and fish oil conservation	The feed fed contains less than 5% wild fish meal and less than 5% fish oil.	Processor maintains copies provided by farmers or feed mills of the signed statement from feed mill(s) specifying the percentage of wild fishmeal and fish oil used in the feeds for the past year prior to purchase of fish.
2. Use of fry or fingerlings from the wild	All fish used for grow out on the farm are from captive, domestic stocks raised on farms and hatcheries.	Processor maintains copies provided by farmers or hatcheries/vendors of the signed statements from fry and fingerling suppliers of the origin of the fish sold.
Catfish Farm		
1. Fishmeal and fish oil conservation	The feed fed contains less than 5% wild fish meal and less than 5% fish oil.	The farm or processor will obtain annually a signed statement from the feed mill(s) that specifies the percentage of wild fish meal and fish oil used in the feeds for the past year.
2. Use of fry or fingerlings from the wild	All fish used for grow out on the farm are from domestic stocks raised on farms and hatcheries. All fry and fingerlings grown have been raised on farm or on a hatchery that supplies the farm with fingerlings for stocking.	The farm or processor will obtain annually a signed statement certifying the origin of fry or fingerlings from the vendor for the past year.

Table 2. U.S. Farm-Raised Catfish Environmental Sustainability Standard – Summary