

## **U.S. Farm-Raised Catfish Environmental Sustainability Certification Program (U.S. Catfish Sustainability Program) of the Catfish Farmers of America**

### **2025 Annual Report**

The U.S. Catfish Sustainability Program (formally the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program) was developed by the Catfish Farmers of America (CFA) over the past decade with input and engagement of all major segments of the U.S. catfish farming industry, including processors, feed mills, hatcheries, farmers, and technical experts. The 3<sup>rd</sup>-party audits of those entities participating in the U.S. Catfish Sustainability Program are conducted by the USDA-Processed Verified Program (USDA-PVP) based on the CFA Standard for the program. For USDA-PVP to agree to provide the 3<sup>rd</sup>-party audits, the standard must be reviewed to ensure that it meets the USDA-PVP criteria of being verifiable, repeatable, auditable, feasible, and factual as required by USDA-QAD 1000. The standard for the U.S. Catfish Sustainability Program underwent four reviews with final approval for inclusion in the USDA-PVP Program of 3<sup>rd</sup>-party auditing in May, 2022.

The first company approved to participate in the USDA-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program (U.S. Catfish Sustainability Program) was announced in June, 2024. The approval was granted based on successful outcomes of a desk audit by USDA-PVP auditors 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.

This report summarizes 2025 activities of the U.S. Catfish Sustainability Program in 2025.

### **2025 Activities**

#### Standards Committee

Two new members were added to the Standards Committee to represent non-profit organizations. The 2025 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)  
William Green (Alabama/non-profit organization)  
Britton Hatcher (Mississippi/non-profit organization)

### Meetings of the Standards Committee

The CFA Standards Committee met three times in 2025. At the January 21, 2025 meeting, the committee took the following actions: 1) approved Version 2.1 of the CFA Quality Manual and Operating Procedures; and 2) approved the List of Required Documents appended to the CFA U.S. Catfish Sustainability Program Standard.

Actions taken at the June 11, 2025 meeting included: 1) approval of Version 3.2 of the CFA Standard for the U.S. Catfish Sustainability Program; and 2) approval of Version 2.2 of the CFA Quality Manual and Operating Procedures.

An electronic vote was held from September 18 through 23, 2025, on three new documents drafted for the CFA U.S. Catfish Sustainability Program, and proposed changes to the CFA Quality Manual and Operating Procedures. The following new program documents were approved, including: "Complaints and Appeal Processes," "Policy on Use of CFA and Sustainably Grown Logos;" and "Terms of Reference for the CFA Standards Technical Committee." In addition, Version 2.3 of the CFA Quality Manual and Operating Procedures was approved.

### Website Renovation

A major renovation of the Sustainability website was completed, moving the Sustainability pages to the Catfish Farmers of America website, at <https://www.catfishfarmersofamerica.com/sustainability>.

That website now includes the following materials

- CFA U.S. Catfish Sustainability Standard
- CFA Quality Management System and Operating Procedures
- Policy documents that include
  - ❖ Terms of Reference
  - ❖ Policy on Logo Use
  - ❖ Policy on Complaints & Appeals
- Annual reports of the CFA U.S. Catfish Sustainability Standard
- List of CFA certified entities
- Form for questions or comments on the program

### GSSI Benchmarking

In 2024, the CFA U.S. Catfish Sustainability Program entered the “Pre-Assessment” phase of benchmarking by the Global Sustainable Seafood Initiative (GSSI). Throughout 2025, there was a great deal of interaction with GSSI personnel and the Independent Experts (IEs) that provided review feedback to GSSI. The IE comments from the GSSI Pre-Assignment were received the end of December, 2024 and the CFA responses were submitted January 28, 2025. In February, Engle met with the GSSI Director at the Boston Seafood Show. As per the GSSI process, there were followup virtual meetings with the Pre-Assessment IEs in March, 2025 on their final recommendations, both of which were “All in Alignment.” The Pre-Assessment IEs provided

further suggestions on strengthening the CFA application for Full Alignment. Following this favorable result from Pre-Assessment, a contract was signed by CFA with GSSI to enter the Full Alignment process.

The application for Full Alignment was submitted to GSSI June 27, 2025, following development of additional documents as recommended by the Pre-Assessment IEs. Responses were received from one Full Alignment IE on Sept. 4, 2025 (for Sections A & B), and from the other IE on Sept. 25, 2025 (for Section C). The responses indicated that many components were considered by these reviewers to not be in alignment. Key issues mentioned by the reviewers were related to the key differences in the CFA program that works with USDA-PVP for 3<sup>rd</sup>-party auditing; more specifically, that CFA is a farmer trade association not an NGO; and that the 3<sup>rd</sup> party auditors/accreditors are employees of a U.S. federal government agency that operates under rules and procedures dictated by U.S. law with continuous, multi-layered oversight throughout the agency, not consultants under contract with a private/NGO certification or accreditation company. These differences had been discussed from the earliest conversations with GSSI and CFA was led to believe that these would not be obstacles for benchmarking. The Full Alignment reviews indicated that they were considered to be major issues. There were also complaints from the Full Alignment IEs related to the number of documents to read and the volume of evidence provided.

The overall Full Alignment process should have included a meeting with the Benchmark Manager and then with each of the IEs. The meeting scheduled with the Benchmark Manager was scheduled for October 2, 2025, then re-scheduled for Oct. 7, then postponed until after Nov. 3 because the Benchmark Manager was out of the office on sick leave with “work-related burnout.” In addition, the GSSI Director had left GSSI a month or two earlier. This turnover led to additional delays. Virtual meetings with the two IEs were eventually scheduled for November 25, 2025. One was held with the IE reviewer for Section C (Charlie Horsnell) that was organized by a previous GSSI Benchmark Manager who currently appears to be a consultant for GSSI, the SDG (Sustainable Development Goals of FAO) Manager of GSSI, and Ian Pollard (another IE consultant with GSSI, but not one of the IEs assigned to the CFA application). During that meeting, there clearly were misconceptions about the CFA program that were addressed during the meeting, despite the relevant information having been included in the Full Alignment application. The meeting with the second IE (Aimee Rusillo) was subsequently canceled by GSSI as “no longer needed.” Detailed responses to the comments by the IEs were submitted to GSSI on Dec. 16, 2025.

## **Outcomes**

The primary outcomes of the U.S. Catfish Sustainability Program in 2025 include:

1. The first company approved for the CFA/USDA-PVP program had its certification renewed in 2025, following the required annual renewal audit.
2. A second catfish processor was approved for participation in the program in July, 2025.

## **Impacts**

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

## **Annual Management Review**

### *Overall Performance in 2025*

The CFA/USDA-PVP U.S. Catfish Sustainability Program expanded in 2025 with the addition of a second catfish processing company. The first processor approved was re-certified in 2025 through the required on-site renewal audit. No non-conformances (major or minor) or continuous improvement points were identified. The recommendation was to re-certify.

Table 1 presents the performance indicators for the CFA U.S. Catfish Sustainability Program. Company 1 includes two processing facilities, 109 growout farms, six feed mills, and 12 hatcheries. The second company includes one processing facility, 39 growout farms, three feed mills, and three hatcheries. The second company successfully completed the required desk audit and the on-site surveillance audit, whereas the first company approved for the program successfully passed its annual on-site renewal audit. It is important to note that each “audit” includes that of the processing company in addition to 50% of the feed mills and hatcheries that participate in the supply chain as well as a random sample of growout farms. No non-conformances were found and no continuous improvement points were identified in the audits (Table 2).

### *USDA PVP Audits and Auditors*

A virtual training program was held for USDA auditors on May 2, 2025. The program included details on the requirements of the U.S. Catfish Sustainability Program, but also included training specifically on management practices and record-keeping on U.S. catfish farms. The majority of the training was led by Dr. Jimmy Avery (Extension Aquaculture Specialist, National Warmwater Aquaculture Center, Mississippi State University) and Dr. Luke Roy (Extension Professor and Assistant School Director of Alabama Fish Farming Center Operations of Auburn University). The program was attended by 17 auditors and supervisors of USDA-PVP and USDA-QAD.

The following is the agenda for the training program:

<b>U.S. Farm-Raised Catfish Environmental Sustainability Certification Program          (U.S. Catfish Sustainability Program)          May 2, 2025          10:00 a.m. to 12 noon (Central)</b>	
<b>Welcome</b>	Jeffrey Waite/Mike Lopez
<b>Introduction of Speakers</b>	Carole Engle, Ph.D., Engle-Stone Aquatic\$ LLC, Catfish Farmers of America consultant  Luke Roy, Ph.D., Auburn University  Jimmy Avery, Ph.D., Mississippi State University
<b>Overview of U.S. Catfish Sustainability Program</b>	Carole Engle
<b>Aquatic Animal Health</b>	Luke Roy
<b>Production Records, Predator Control,          Chemical &amp; Energy Use, Business Forms</b>	Jimmy Avery
<b>Questions and Discussion</b>	

*Stakeholder Comments for Future Versions of the Standard*

The U.S. Catfish Sustainability Program is the outcome of requests from stakeholders, primarily U.S. catfish processors, supported by survey data, to develop a sustainability initiative for the industry. U.S. 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 U.S. 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. The program website includes opportunities to submit comments from the public, ask questions and seek additional information, and to submit complaints. No comments, questions, or complaints were received from the online options in 2025.

### *Notifications to Stakeholders*

The CFA membership receives notifications from the U.S. 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.

In 2025, the Chair of the Standards Committee reported to the CFA Board in person at the January 30, 2025 meeting in Missouri and virtually at the October 8, 2025 meeting. The Chair also met with and responded to inquiries on the program in person with nine different individuals at the CFA Annual Convention. In addition, the Chair responded to 26 email and 23 telephone requests for updates from interested parties and stakeholders throughout 2025.

### *Comments Received from Stakeholders, Responses, Changes to Standard*

The comments received to date related to the U.S. 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 U.S. Catfish Sustainability Program have been developed substantially from the input received. The program website includes opportunities to submit comments from the public, ask questions and seek additional information, and to submit complaints. No comments, questions, or complaints were received from the online options in 2025.

### *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 is available at <https://catfishfarmersofamerica.com/sustainability>. In addition, questions and complaints can be sent to the email address of the Standards Committee Chair that is listed on the website. No questions or complaints were received from the online options in 2025.

### *Document Control*

Documents of the U.S. 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. Documents include the version number and the approval dates.

Table 1. Performance Indicators for the Catfish Sustainability Program, 2025.

Performance indicator	Company 1	Company 2
Businesses approved to participate in the program		
Processors (no.)	2	1
Farms (no.)	109	39
Feed mills (no.)	6	3
Hatcheries (no.)	12	3
Number of desk audits for new applicants	0	1
Number of on-site audits	1*	1*
Type of on-site audit	Annual renewal audit	Surveillance audit

\*Each “audit” includes that of the processing company in addition to 50% of the feed mills and hatcheries participating in the supply chain as well as a random sample of growout farms.

Table 2. Non-conformances, continuous improvement points identified, and recommendations made by auditors reported in annual report.

Non-conformances		Continuous improvement points	Recommendations made
Major	Minor		
None	None	None	Renewal of 1 company & first certification of 2 <sup>nd</sup> company

**CFA Sustainability -2. Complaint Log and Response Form. 12/23/2025.**

**NO COMPLAINTS HAVE BEEN RECEIVED TO DATE.**

<b>Date</b>	<b>Contact information</b>	<b>Complaint</b>	<b>Response</b>

**CFA Sustainability – 3. Public Comment Log and Response Form. 12/23/2025**

**NO PUBLIC COMMENTS HAVE BEEN RECEIVED TO DATE.**

<b>Date</b>	<b>Contact information</b>	<b>Comment</b>	<b>Response</b>

**CFA Sustainability – 4. Request for Additional Information on Catfish Sustainability Program. 12/23/2025**

**NO ONLINE REQUESTS FOR ADDITIONAL INFORMATION HAVE BEEN RECEIVED TO DATE. ALL REQUESTS FOR INFORMATION TO DATE HAVE BEEN ON PROGRAM UPDATES, EITHER IN PERSON AT MEETINGS, VIA EMAIL OR TELEPHONE. IN EACH CASE, COMPLETE UPDATE INFORMATION WAS PROVIDED.**

<b>Date</b>	<b>Contact information</b>	<b>Information request</b>	<b>Response (with date)</b>