

COFI
Sub-Committee on Aquaculture
Fourth Session
Puerto Varas, Chile, 6-10 October 2008

Draft Common Position

Agenda item 5:

**Technical guidelines in aquaculture certification
(COFI:AQ/IV/2008/3)**

Draft EC Comments on 'FAO Technical Guidelines on Aquaculture Certification ó final draft'

The EC welcomes the work accomplished by FAO on the development of the technical guidelines on aquaculture certification which respond to a need to more globally accepted norms for aquaculture production and serve as a basis for harmonisation of certification schemes.

The EC agrees that improved management of the aquaculture sector is necessary to achieve its potential. Aquaculture products have been involved in a number of high profile food-scares, many concerning the use of antibiotics, in the last decade which have damaged the image of aquaculture products and also fishery products in general. The EC supports in particular the principle (par 18.c) that certification schemes should to the extent possible be based on scientific evidence and that they should ensure that short-term aquaculture development considerations do not compromise the ability to responsibly address long-term concerns or cumulative impacts. The draft document is of high quality and serves as a good basis for going forward in this area. Notwithstanding this, certain improvements and clarifications are needed.

The use of market-based voluntary certification initiatives comprising environmental, social and animal welfare aspects can help to make aquaculture a more sustainable sector of food production. The EC believes however that certification of food safety, from the animal and public health perspectives are core government competence and more reflection is needed on the role of market-based schemes in these areas. All of the above criteria are grouped together in the document and there is insufficient clarity at times between the roles of government and non-government actors.

The document places a high level of priority on fulfilling the requirement of national and international rules (e.g par 31) but does not appear to place sufficient stress on meeting the requirements of the country where the product is to be sold. These can be supplementary to national and international rules in cases permitted under SPS rules.

Specific comments:

Par 10 - need for greater elaboration on qualifications required by certification entities.

Par 18.i ó the principle of non-discrimination based on 'scale, intensity of production' seems to contradict the idea of responsible aquaculture as large-scale highly intensive aquaculture operations may have difficulty in being responsible and sustainable in the long term. Clearer drafting of 18.i would be helpful in this regard.

Par 34 ó 'Growth promoting substances' are listed among the list of substances which can only be used if permitted by the competent national authority. The use of hormones and beta agonists for growth promotion are not permitted under EU legislation (Directive 96/22). The drafting should be clearer as to what it meant by growth promoting substances.

Par 49 ó in the absence of national legislation on Environmental impact assessments the EU or OECD format for EIA can provide models for best practice.

Par 58 ó To predict whether exotic species pose 'low potential risk to the natural environment' reference should be made to existing voluntary frameworks for risk assessment regarding the use of exotic species such as the International Council for the Exploration of the Sea (ICES) Code of Practice on the Introductions and Transfers of Marine Organisms.

Par 71 ó The wording here appears to soften the social responsibility requirements of the preceding paragraphs to a high degree.

Par 88 ó The meaning of the wording 'open to comment' at the end of the paragraph is unclear.