Fisheries and Oceans Canada | Pêches et Océans Canada

Submitted: 11 February 2009

Dear Mr. Rohana P. Subasinghe:

Canada has always strongly supported the FAO's efforts in developing technical Guidelines for aquaculture certification and believes that this work is important in order to establish internationally agreed standards amid the proliferation of various certification and eco-labelling schemes and campaigns around the world.

As these Guidelines would likely have *de facto* trade implications with respect to farmed fish and fish products, the importance of countries (exporting or importing) to review them carefully – especially in light of agreed international trade standards and rules – cannot be stressed enough. In addition, these Guidelines should not be perceived as, or enable, even if inadvertently, technical barriers to trade that would disrupt the normal course of international trade and market access among legal and responsibly-produced products.

The issue, of course, is how to define legal and responsibly-produced *product* or *operations*. Canada has prepared the attached document, outlining questions and comments, with some specific edits to several paragraphs. We also offer some general comments that indicate Canada's positions on some fundamental issues.

A key distinction to be made is the difference between legal and responsibly-produced *product* or *operations*, and a national *policy* choice to achieve certain outcomes (which would normally lie within the sovereign purview of States). These Guidelines, and goals of certification more generally, are not to promote the certification of States' policies, but rather to certify safe, environmentally-responsible products entering trade.

One of the main concerns is that in several areas some proposed aspects of the Guidelines seem to intrude into national sovereignty with respect to making policy and political decisions, especially in the areas of environmental integrity and social responsibility. Some issues covered by these Guidelines have the effect of judging state policy, not sustainability of aquaculture products from particular operations, such as equity and income distribution or even specific tools to manage certain issues, such as pollution (e.g., market-based approaches versus regulatory approaches). It is up to each state to determine the right mix of policy tools to effect a particular outcome, according to its needs, policies and culture.

International debate on benchmarks for such concepts as "responsible" trade, equity and social standards have been discussed in policy circles for decades, with no resolution, and it is not credible that these Guidelines would assume that such debates are concluded, much less measurable.

In this respect, it should also be noted that several aspects of aquaculture, such as animal health and food safety, are already highly regulated by national governments according to international standards. In order to avoid potential duplication, confusion or misinterpretation, it is necessary to ensure conformity of these Guidelines with other established international standards, including relevant World Trade Organization (WTO) agreements, *Codex Alimentarius* and World Organisation for Animal Health (OIE) codes.

On the other hand, international standards do not currently exist for some provisions in these draft Guidelines, particularly those related to social responsibility and animal welfare.

Furthermore, Canada joined in the consensus at the FAO Sub-Committee on Fish Trade that endorsed a view that fisheries production forms a continuum from wild fishery to aquaculture (e.g., through ranching, enhancement, and also including inland fisheries). As such, Canada agreed, as did other States, that a coherent approach is needed among various guidelines. Indeed, such work has already been taken in adapting the Eco-labelling Guidelines to inland fisheries, for example. Therefore, and also in light of the above, coherence with the FAO *Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries* is essential to ensure that all fish and fish products will be upheld to similar and coherent standards or principles (as appropriate) when they are subject to eco-labelling and certification processes. Thus, definitions should be clear and terms should be used in a consistent manner among the guideline documents, with necessary differences in approach validated and explained where necessary.

Since these Guidelines will serve as a benchmark document that sets out minimum requirements for aquaculture certification, it is crucial to ensure clarity of the scope. For example, every certification scheme that would be able to cite consistency with these Guidelines should meet all the minimum standards, not a selection among some or several elements. This is essential for States (who often use such guidelines to identify schemes for which they might assist with eco-labelling or certification efforts, or which not) and is necessary to avoid market confusion by legitimizing all labels. Otherwise, these Guidelines will contribute to, rather than reduce, market confusion. This situation already exists in the case of wild fisheries, where eco-labelling schemes as well as partial "campaigns" try to assert consistency with the Eco-labelling Guidelines for legitimacy, when indeed few do. In fact, the Sub-Committee on Fish Trade has already asked the FAO to map various schemes and campaigns against the Eco-labelling Guidelines. It would be inappropriate, in that light, for the FAO, at the same time, to sponsor Guidelines that could be consistent with a wide range of schemes or campaigns, both credible and not credible.

The views expressed here are preliminary comments, which may be either modified or reinforced as views are shared by other countries or other interested parties. Canada looks forward to reviewing a substantially-revised document of the draft Guidelines and their eventual finalization through formal FAO processes in order to have practical guidance that facilitates fair trade of certified aquaculture products. If any future state-to-state discussions are not based on a significantly-revised approach, then these discussions will be, in Canada's view, inefficient.

Canada is committed to working with other countries and interested parties to develop effective Guidelines for aquaculture certification, welcomes the opportunity to discuss text proposals with other countries, and looks forward to further discussions at the FAO Committee on Fisheries.

Sincerely,

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International Policy and Integration

and

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Canada's Comments on the Draft FAO Technical Guidelines on Aquaculture Certification

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Table of Contents ~~BACKGROUND~~ TERMS AND DEFINITIONS SCOPE USERS APPLICATION PRINCIPLES MINIMUM SUBSTANTIVE CRITERIA **Animal Health ~~and Welfare~~** **Food Safety and Quality** **Environmental Integrity** **~~Social Responsibility~~** INSTITUTIONAL AND PROCEDURAL REQUIREMENTS **Governance** **Standard Setting** **Accreditation** **Certification** ~~IMPLEMENTATION~~	Most of Canada's comments fall into three general categories: **1) State sovereignty:** As currently drafted, a certification scheme developed in conformity with these Guidelines will end up judging a State's policy and political decisions, rather than the management systems of an aquaculture facility and its eventual product. In making political statements about policy choices, these draft guidelines have the effect of encouraging the development of certification schemes that endorse values rather than sustainability outcomes, and *de facto* use these to affect trade. **2) Coherence within the value chain:** As discussed at the FAO Sub-Committee on Fish Trade, fisheries are a continuum from wild capture, to ranching, to aquaculture. Canada believes that certification is intended to certify product coming from a rigorous risk-based management regime. The wild fish eco-labelling guidelines achieve this goal. On the other hand, the aquaculture certification guidelines, as currently drafted, are based on a different philosophy: certifying the policies underlying a country's management framework (as discussed above). Canada sees this as incoherent with the approach taken for the wild fish eco-labelling guidelines. This difference is particularly evident in the draft guidelines on social responsibility and small-scale operations. Canada believes that the principles for certification should be the same for all aquaculture production, whether large or small. However, the application of those principles might differ in terms of the data required, the risk assessments undertaken or other elements. **3) Coherence with other international standards:** Careful consideration should be given to ensure that any language in the guidelines would not constitute a technical barrier to trade, or run counter to a State's obligations under the World Trade Organization (WTO), particularly the Agreement on Technical Barriers to Trade and the Agreement on the Application of the Agreement on Sanitary and Phyto-Sanitary Measures. Besides WTO agreements, efforts should also be made to ensure consistency between these guidelines and other relevant international standards (e.g., World Organisation for Animal Health (OIE) codes), which may require a degree of standardization, where appropriate.

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~~BACKGROUND~~	
~~1. Global production from aquaculture is growing substantially and provides increasingly significant volumes of fish and other aquatic food for human consumption, a trend that is projected to continue. Although aquaculture growth has potential to meet the growing need for aquatic foods and to contribute to food security, poverty reduction and more broadly to achieving sustainable development and the Millennium Development Goals, it is increasingly recognised that improved management of the sector is necessary to achieve this potential.~~	The guidelines do not need to make the case for improved management through various tools. This has already been recognized through the development of this and other initiatives. There are numerous international standards for food safety and all States regulate for this. If this is to be included in the guidelines, it will be important to align accurately with all international regulations, to avoid confusion for consumers and regulators.
~~2. Aquaculture is a highly diverse production sector comprising many different systems, sites, facilities, practices, processes and products, conducted under a wide range of political, social, economic and environmental conditions.~~	
~~3. Aquaculture production and trade has increased, but concerns have emerged regarding possible negative impacts on the environment, communities and consumers. Solutions to many of these issues have been identified and addressed. The application of certification in aquaculture is now viewed as a potential market based tool for minimising potential negative impacts and increasing societal and consumer benefits and confidence in the process of aquaculture production and marketing.~~	
~~4. Although aquatic animal health and food safety issues of aquaculture *have been subjected to certification and international compliance for many years,* aspects of animal welfare, environmental issues and social issues have not been adequately subjected to compliance or certification as a prerequisite for international trading. At present, the aquaculture industry and market increasingly recognize that credible certification schemes have the potential to reassure buyers, retailers, consumers and civil society regarding these concerns and provide a further tool to support responsible and sustainable aquaculture.~~	Paragraph 4 of the Background indicates that values statements should be a pre-requisite for international trade, which is not acceptable. One example is that animal welfare is not defined within the document nor is there any internationally agreed standard for animal welfare related to aquaculture certification, nor for trade. Thus, there is nothing for this to be objectively measured against.

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TERMS AND DEFINITIONS 5. For the purpose of these international guidelines on aquaculture certification, the following terms and definitions apply. These terms and definitions come from or were derived from existing recognized material (e.g. FAO[1], ISO[2], Codex Alimentarius[3], FAO Eco-labelling Guidelines, FAO Code of Conduct for Responsible Fisheries (CCRF) and many others), and stakeholder inputs received during the process of developing the guidelines.	As currently drafted, many terms are poorly or inconsistently defined and require clarification. Definitions should be as concise and clear as possible, without explanations of the evolution of the word or phrase. Where the terms also appear in the marine eco-labelling guidelines, the same definitions should be used, assuming that consistency is necessary. If there is a difference in the meaning of terms used the marine eco-labelling guidelines and the same terms used in the aquaculture certification guidelines, then this should be explained. Where definitions are taken from other international standards, they should be quoted directly without adaptation to prevent any potential confusion or inadvertent re-casting.
Better Management Practice(s) (BMP(s) ***Voluntary m****anagement practices aimed at improving the quantity, safety and quality of products taking into consideration animal health ~~and welfare~~, food safety, environmental ~~and socio-economical~~ sustainability. ~~BMP implementation is generally voluntary. The term "better" is preferred rather than "best" because aquaculture practices are continuously improving (today's 'best' is tomorrow's 'norm').~~* (Adapted from the International shrimp principles by the Consortium "Shrimp Farming and the Environment".)	Re-drafting is proposed for clarity and brevity.
Certification *Procedure by which ~~an official certification body or officially recognised certification body~~ **a third party** gives written or equivalent assurance that a product, process or service conforms to specified requirements. Certification may be, as appropriate, based on a range of ~~audit~~ **inspection** activities that may include continuous ~~audit~~ **inspection** in the production chain.* (Modified from ISO Guide 2, 15.1.2; Principles for Food Import and Export Certification and Inspection, CAC/GL 20; Eco-labelling Guidelines)	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason. In eco-labelling guidelines, the term "inspection" is used instead of "audit." The two terms are not synonymous in many other contexts. If this term is included, then a definition for "audit" might be required to prevent confusion.

[1] Food and Agriculture Organization of the United Nations
[2] International Standards Organization,
[3] Codex Alimentarius Commission

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Certification body or entity *Competent and recognized body that conducts certification ~~and audit activities~~. A certification body may oversee certification activities carried out on its behalf by other bodies.* (Based on ISO Guide 2, 15.2)	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
Certification scheme *The processes, systems, procedures and activities related to standard setting, accreditation and implementation of certification, including the labelling of practices, operations and products.* (Adapted from Bangkok Workshop Report)	This definition is likely to cause confusion, since it incorporates both certification and accreditation. Standards are also often referred to as "certification schemes."
Chain of custody *The set of measures ~~that verify~~ **which is designed to guarantee** that a certified product originates from a certified aquaculture production chain, and is not mixed with non-certified products. Chain of custody verification measures should cover the tracking/traceability of the product all along the production, processing, distribution and marketing chain, the tracking of documentation, and the quantity concerned*.	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
Conformity assessment *Any activity concerned with determining directly or indirectly that relevant requirements are fulfilled. Typical examples of conformity assessment activities are sampling, testing and inspection; evaluation, verification and assurance of conformity (supplier's declaration, certification); registration, accreditation and approval as well as their combinations. ~~Conformity assessment procedures are technical procedures — such as testing, verification, inspection and certification — which confirm that products fulfil the requirements laid down in regulations and standards.~~* (Modified from ISO Guide 2, 12.2)	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
Equivalence *Equivalence is the capability of different inspection and certification systems to meet the same objectives and should be recognised by exporting and importing countries as such. Equivalence may be confirmed by auditing the relevant inspection and certification systems and, as appropriate, the facilities and procedures in the exporting country.* (Codex Alimentarius Commission)	This definition should refer to WTO's decision on the implementation of Article 4 of the Agreement on the Application of SPS Measures (Equivalence): G/SPS/19. The guidelines should also indicate how a methodology for assessing equivalence might be developed.

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~~**Genetically modified organism (GMO)**~~ ~~*An organism that has been transformed by the insertion of one or more transgenes.*~~ ~~(FAO)~~	This definition is not appropriate for the guidelines; its inclusion is based on the assumption that genetic modification adversely affects food safety and quality, which is a value judgement. Decisions on "risk" should be based on science-based risk management practices that are carried out by a competent authority, and not be based merely on the method of production. Whether or not a marine product is genetically altered should have no bearing on these guidelines. Canada's trade experts advise that this should not be addressed in these guidelines.
Group certification *Certification for a group of farmers, normally considered for small-scale aquaculture farmers, for whom individual certification is cost prohibitive and who have key characteristics in common, e.g. common marketing of the produce as a group, homogeneity of members in terms of location, production system, products, the group has an Internal Control System to ensure compliance with the standards by all members of the group. The group of facilities or operations that are considered collectively may: a) be in close proximity to each other, b) share resources or infrastructure (e.g. water sources or effluent discharge system), c) share a landscape unit (e.g. watershed), d) have the same production system, e) involve the same farmed species; or f) other common characteristics as appropriate.*	Equivalence issues need to be agreed upon to inform the mechanism of group certification. More discussions are needed on the implications of group certification such as how members would be audited and whether all farms in a group would become decertified if one fails an audit.
Management systems certification of aquaculture/fisheries operations ***Management systems certification bodies shall be accredited to certify aquaculture/fisheries companies/organizations management systems (processes).***	This definition should be added.
~~**Precautionary Approach**~~ ~~*A set of agreed measures and actions, including future courses of action that ensures prudent foresight and reduces or avoids risk to the resource, the environment, and the people, to the extent possible, taking into account existing uncertainties and the potential consequences of being wrong.*~~ ~~(Adapted from FAO)~~	Canada supports implementation of the precautionary approach for wild capture fisheries management and for sustainable aquaculture development. Canada supports science-based risk management to ascertain whether an agricultural product is for a particular end use. That said, Canada's trade experts are opposed to the inclusion of this definition, because implementation of the precautionary approach is determined by each state. Inclusion of this concept in a set of guidelines that affect trade could create trade barriers from a WTO TBT perspective.

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Product certification *Verification that a certain product has passed performance and/or quality assurance tests or qualification requirements stipulated in standards or regulations or that it complies with a set of criteria governing quality and/or minimum performance requirements.*	The current heading and text should be replaced with ISO/IEC 17000 clause 5.5 (certification, as above). It is unlikely that product certification could be based solely on quality assurance tests or compliance with a set of criteria governing quality. Product certification is demonstration through a mark or certificate that a particular product, process or service meets relevant requirements (performance and/or safety requirements) laid down in a particular standard or regulation. This is the meaning applied by regulatory authorities.
~~**Small-scale aquaculture**~~ ~~*Aquaculture farms with small production volume, and/or relatively small surface area, mainly without permanent labour, and typically lacking technical and financial capacity to support individual certification. Depending on the production systems used, other considerations include production technology; resources; number of workers, including owner; economics, including annual income; relative importance of aquaculture as contributor to total income; ownership. Small-scale aquaculture farms are typically: 1) family sized operations; 2) using family labour; 3) based on the family's land; and 4) owner operated. Small-scale aquaculture may be diffused through a local area or district, or highly concentrated around specific resource (e.g. water supply or processing plant).*~~ ~~(Adapted from Bangkok Workshop Report)~~	This definition is likely not needed. All aquaculture should be certified under the same principles; however, the application might differ, as is the case for the eco-labelling guidelines. Risk-based approaches can be used to develop certification standards for smaller scale operations.
Small-scale farmers *Resource poor individuals or groups of people involved in small-scale aquaculture production, i.e. aquaculture production facilities and processes with small production volume, and/or relatively small surface area, and typically lacking technical and financial capacity and other resources to support individual certification.* (Adapted from Bangkok Workshop Report)	As above, this links to the question of how to account for small-scale aquaculture – whether a common set of "sustainability principles" should be adapted in application or whether the guidelines themselves should include caveats for small-scale operations. Currently, there is no definition of small-scale fisheries, which might presumably experience similar challenges as small-scale farming operations. As indicated earlier, social sustainability issues are the subject of long-standing international debate, without resolution on how to demonstrate or measure. Other than making provisions for different application of common principles, it is not clear how this issue could be addressed within these guidelines.

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~~**Socially responsible aquaculture**~~ ~~*Aquaculture that is developed and operated in a responsible manner, i.e. that benefits the farm, the local communities and the country; that contributes effectively to rural development, and particularly poverty alleviation; has employees who are treated fairly; maximizes benefits and equity; minimizes conflicts with local communities; ensures worker welfare and fair working conditions; minimizes risks to smallholders; and provides training to workers in responsible aquaculture practices.*~~ ~~(Adapted from the International shrimp principles by the Consortium "Shrimp Farming and the Environment" Principle 8)~~	In these guidelines "social responsibility" refers mainly to providing assistance to small-scale farmers. Similar to the discussion above, decisions on social responsibility and income re-distribution issues are values or policy-based and reflect sovereign policy choices, as are choices about assistance to small-scale operations. Should the FAO wish to address technical assistance, this could be more appropriately done in a separate document or through a specific request to the WTO Committee on Technical Barriers to Trade.
Sustainable aquaculture development: **Sustainable development is the management and conservation of the natural resource base and the orientation of technological and institutional change in such a manner as to ensure the attainment and continued satisfaction of human needs for present and future generations. Such sustainable development (in the agriculture, forestry and fisheries sectors) conserves land, water, plant and animal genetic resources, is environmentally non-degrading, technically appropriate, economically viable and socially acceptable.**	Sustainability is the main objective of the FAO Code of Conduct. A definition of sustainable development from the *FAO Technical Guidelines for Responsible Fisheries 5 – Aquaculture Development* should be added.
~~**Third Party Certification**~~ ~~*Procedure by which an accredited external, independent, certification body, which is not involved in standards setting or has any other conflict of interest, analyzes the performance of involved parties, and reports on compliance. This is in contrast to first party certification (by which a single company or stakeholder group develops its own standards, analyzes its own performance, and reports on its compliance and second party certification (by which an industry or trade association or NGO develops standards, analyzes the performance of involved parties, and reports on compliance).*~~ ~~(Adapted from Bangkok Workshop Report)~~	The current heading and text should be replaced with ISO/IEC 17000 clause 2.4 (third-party conformity assessment activity), or delete the definition altogether. This definition refers to "involved parties" and not to compliance of products; consequently, this definition is in conflict with the definition of "certification." Third-party certification is generally understood to refer to the process by which an independent third party demonstrates that production processes or services comply with relevant requirements. Processes would include management systems such as ISO 9001 quality systems standard. In the WTO context, there is no recognition of "first" or "second-party" certification. It would be best to avoid definitions which may conflict with and potentially undermine the meaning of third-party certification, which underpins the regulatory regime of many WTO members.

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Traceability *The ability to follow the movement of a product of aquaculture or inputs such as feed and seed, through specified stage(s) of production, processing and distribution. The documentation and other evidence by which a certified product can be traced back from each buyer to each supplier through the chain of custody all the way to the certified production area from which it originated.* (Adapted from ISO; MAC HHT Standard; Bangkok Workshop Report)	This definition should refer to the definition in the Codex Alimentarius Commission Procedural Manual: "Traceability/Product Tracing: the ability to follow the movement of a food through specified stage(s) of production, processing and distribution".
~~**Transparency**~~ ~~*While respecting legitimate concerns to preserve confidentiality, certification systems should be open to scrutiny by consumers and their representative organizations, and other interested parties. Transparency seeks to achieve a greater degree of clarity, predictability and information. Transparency also implies answering reasonable questions and publishing information and standards. Transparency refers to a process that is open, inclusive, well documented and includes proactive communication to stakeholders and public disclosure of the process, decisions and results.*~~ ~~(Adapted from Bangkok Workshop Report)~~	Canada supports initiatives to improve transparency for wild capture fisheries management and sustainable aquaculture development. However, the implementation of this principle should be addressed in the body of the guidelines, not in the definition.
SCOPE 6. These guidelines provide guidance for the development, organization and implementation of credible aquaculture certification schemes, including: a) animal health ~~and welfare~~, b) food safety and quality, c) environmental integrity and~~/or~~ d) ~~social responsibility~~ associated with aquaculture. An aquaculture certification scheme may address one or all of these issues.	The scope of the aquaculture certification guidelines should be more focused and additional information (i.e., articles 8 and 9) should be moved to other parts of the guidelines. The terms and relevant articles on animal welfare and social responsibilities should be removed, because there are no existing internationally agreed standards for animal welfare or social responsibility and thus nothing to measure against. These are value judgements. A certification scheme should not allow for choice from many components. A minimum standard for a management framework for responsible product is needed and should not contain options. In the wild fishery, market confusion has arisen between full eco-labelling schemes and "campaigns" that selectively choose various criteria. The intent of the FAO marine eco-labelling guidelines was to help reduce this confusion, and so should these guidelines.

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7. The guidelines ~~cover the~~ **consider a** range of issues ~~which should be considered~~ relevant for the certification in aquaculture including: a) animal health ~~and welfare~~, b) food safety and quality, c) environmental integrity and~~/or~~ d) ~~social responsibility~~ associated with aquaculture. ~~An aquaculture certification scheme may address one or all of these issues.~~	As discussed above, without a standard set of guidelines against which all certification schemes can be assessed, almost any certification scheme could claim consistency with FAO guidelines, thereby creating market confusion.
Articles 8 and 9 [delete these Articles]	These articles are not scope statements.
USERS 12. These entities should use these guidelines in developing, implementing or revising certification schemes that seek to address ~~any or all of~~ the following issues: a) animal health ~~and welfare~~, b) food safety and quality, c) environmental integrity, and d) ~~social responsibility.~~	As above.
17. The evaluation **[would]** use these guidelines to assess whether a certification scheme is developed and implemented in accordance with the guidelines regarding, *inter alia*: • Whether the principles have been adhered to. • Whether the considerations have been addressed. • Whether the objectives of the scheme and issue areas have been addressed in accordance with the appropriate minimum substantive requirements. • Whether the standard setting, accreditation and/or certification have been developed and implemented in accordance with the institutional and procedural requirements.	If an evaluation is conducted on any of the social responsibility/technical assistance elements included in these guidelines, it is foreseeable that a certification scheme could be deemed not in accordance with these guidelines if it does not comply with the technical assistance elements. Canada suggests using square brackets until the later Articles are finalized.
PRINCIPLES 18. Aquaculture certification schemes: a. **<u>To the extent possible, should be based on an international standard or guideline, if available, and</u>** must recognise the sovereign rights of States and comply with relevant local, national and international laws and regulations. They must be consistent with relevant international agreements, conventions, standards, codes of practice and guidelines.	Guidance might be needed for situations where the certification scheme is in conflict with State laws and regulations. Instead of creating new language that may lead to misinterpretation, the guidelines should simply say that States must observe the rights and obligations under the WTO's Sanitary and Phytosanitary (SPS) Agreement and comply with other internationally-agreed standards and guidelines (including the *Codex Alimentarius* and

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	the World Organisation for Animal Health (OIE) standards), and must harmonize or base their national regulations on those standards and guidelines (refer to Article 3 of the SPS Agreement on harmonization).
b. must recognise that any person or entity undertaking aquaculture activities is obliged to comply with all national laws and regulations ~~and international agreements~~ **that are** developed and agreed by ~~governments~~ **the relevant competent national authority,** in relation to aquaculture.	International agreements are made by government authorities who assume responsibility for citizen compliance via legislation, regulation and/or policy.
c. must be developed based on the best scientific evidence available ~~(or use meaningful proxies when such data is not available),~~ taking into account traditional knowledge **[**, providing that its validity can be objectively verified**]**. ~~They must ensure that short-term aquaculture development considerations do not compromise the ability to responsibly address long-term concerns or cumulative impacts.~~	A clear definition of "traditional knowledge" is required in order to avoid creating potential trade barriers. The phrase "providing that its validity can be objectively verified" requires further discussion, as the intent of this phrase in relation to traditional knowledge is not clear. The last phrase is a value statement.
c.bis. must receive, if applicable, testing results of contents of aquaculture products from accredited testing laboratories as part of their product certification activity.	References to product testing (e.g., as related to food safety) can be added to these guidelines.
d. must be developed and implemented in a transparent manner and must ensure that there is no conflict of interest among the entities that are responsible for standards setting, accreditation, and certification. ~~These entities must facilitate mutual recognition, strive to achieve harmonization and recognise equivalence, based on the requirements and criteria outlined in these guidelines.~~	It should be noted that governments enter into mutual recognition agreements and equivalency agreements, after careful study of the other countries accreditation/certification/standards. Accreditation bodies themselves could not facilitate the negotiation of an equivalency agreement.
e. must be open to scrutiny by consumers, civil society, and their respective organisations and other interested parties, while respecting legitimate concerns to preserve confidentiality.	An additional statement could be included referring to the preservation of intellectual property concerns. A reference to the WTO Trade-Related Aspects of Intellectual Property Rights (TRIPS) Agreement might be necessary.
f. must be credible and robust, be fully effective in achieving their designated objectives, ~~and must establish and maintain the confidence of the farmers and industry operators participating in the scheme, as well as the confidence of other stakeholders, including consumers, governments and civil society groups.~~	There are no international standards relating to measuring confidence levels.

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g. must promote responsible aquaculture during production, including the use of inputs such as seeds and feed, harvesting and post-harvest handling.	It is not clear why "responsible aquaculture" is defined here as being limited to concerns around seeds and feed, harvesting and post-harvest handling.
~~h. must ensure traceability of certified aquaculture products and processes; promote continuous and measurable improvements in performance; and establish clear accountability for all involved parties, including the owners of certification schemes, auditors and the certification bodies, in conformity with international requirements, as necessary.~~	This is relevant for labels, not certification.
i. must not discriminate against any group of farmers practicing responsible aquaculture based on scale, intensity of production, or technology; promote cooperation among certification bodies, farmers and traders; incorporate reliable, independent auditing and verification procedures; and should be cost effective to ensure inclusive participation of responsible farmers.	Add "ownership structure" to this list. This text should be changed to read "auditing or verification procedures" since an audit is an example of how something could be verified. Will actual audits be required or could "verification" of approaches be required?
j. ~~must strive and encourage responsible trade,~~ should not create unnecessary obstacles to trade, and should facilitate market access.	"Responsible trade" is not internationally defined, as it is the subject of much unresolved policy debate.
~~k. must ensure special considerations are provided to address the interests of resource poor small-scale farmers, especially the financial costs and benefits of participation.~~	Capacity building is an activity that should be addressed outside these guidelines and their resulting certification processes. The development of a particular production sector is a policy choice outside the context of a management framework for products.
l. must recognize the special needs for developing countries~~, i.e. developed country importers should take into account the inadequate capabilities of developing countries and provide the necessary assistance with implementation.~~	Matters related to assistance would be better addressed in a separate document where guidance could be provided on how developed countries could encourage their importers to work with developing country exporters to build capacity. This should not be a condition for certification of sustainability of a product.

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MINIMUM SUBSTANTIVE CRITERIA 19. Minimum substantive criteria for developing aquaculture certification standards are provided in this section for a) animal health ~~and welfare~~, b) food safety and quality, **and** c) environmental integrity ~~and d) social responsibility. The extent to which a certification scheme seeks to address the issues in all or some of these four areas depends on the objectives of the scheme, which should be explicitly and transparently stated by the scheme.~~ Development of certification schemes should consider the importance of being able to measure performance of aquaculture systems and practices, and the ability to assess conformity with certification standards.	As above, market confusion will be created if certification schemes can choose elements. A standard is expected to apply to all certification schemes. It is important to measure performance of aquaculture systems and practices; however, when policy and value statements are included in the guidelines, then the end result is that the policies of a sovereign state will be evaluated, which is beyond the control of an aquaculture operation.
Animal Health ~~and Welfare~~ 20. Aquaculture activities should be conducted in a manner that assures the health ~~and welfare~~ of farmed aquatic animals~~, by optimizing health, minimizing stress, reducing aquatic animal disease risks and maintaining a healthy culture environment at all phases of the production cycle~~.	How health of animals is addressed is a national issue.
Minimum substantive criteria for addressing aquatic animal health ~~and welfare~~ in aquaculture certification schemes: 21. Aquaculture facilities/operations should prepare and implement an aquatic animal health management programme in compliance with relevant national **legislation** and international ~~legislation~~ **law/guidelines/standards.**	Canada suggests replacing "legislation" with "standards" unless there is actual international law that can be cited. Alternative text could say "national legislation and international guidelines" such as the first sentence of article 35.
24. Preference should be given for the use of aquatic animals certified healthy and/or free of serious pathogens in aquaculture.	The term "serious pathogens" requires a definition.

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25. Maintenance of an healthy culture environment at all phases of the production cycle to reduce risks of aquatic animal disease before they occur by: • Thorough preparation of the culture facilities before stocking (e.g. system disinfection and fallowing according to the OIE Aquatic Animal Health Code). • Maintenance of optimal environmental conditions through management of stocking densities, aeration, feeding, water exchange, phytoplankton bloom control, etc., as appropriate. • Employment of effective quarantining where necessary • Implementation of health management practices that reduce animal stress. • Routine monitoring for early detection of aquatic animal health problems. • Implementation of management practices that avoid or reduce the likelihood of disease transmission within and between aquaculture facilities or to the natural aquatic fauna.	There should also be reference to disease transmission from natural aquatic fauna to aquaculture facilities.
28. Careful consideration of species used in polyculture or integrated multi-trophic aquaculture to reduce potential stress ~~and suffering~~ of culture species. 29. Implementation of measures to reduce unnecessary stress ~~and suffering~~ of animals during culture, harvest, in transit, at market or at a place of slaughter, as appropriate.	Articles 28, 29: There is an international standard against which to measure "stress", but there is no international standard against which "suffering" could be measured.
[30. Workers should be trained on good aquatic animal health management practices to ensure they are aware of their role and responsibility in maintaining aquatic animal health and welfare in aquaculture.**]**	This seems to be quite detailed. There might need to be some discussion on whether a detailed statement is required or a more general statement would be sufficient.
Food Safety and Quality 31. Aquaculture activities should be conducted in a manner that ensures food safety and quality by implementing appropriate standards and regulations as defined by FAO/WHO *Codex Alimentarius*, and in related codes of practice and guidelines developed within the context of the *Codex Alimentarius* Commission ~~and any other relevant organizations.~~	This section should be written to align with all international regulations; otherwise, confusion might be created among consumers and regulators. Consideration should be given to deleting quality references when they are linked to food. "Quality" is elusive and subjective and there are no references to "quality" or how "quality" could be measured for certification in this section. Specific organizations should be listed instead of using general term such as "other relevant organizations". It should also be noted that States have the right to exceed the standards set by *Codex*.

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Minimum substantive criteria for addressing food safety and quality in aquaculture certification schemes:	
32. Aquaculture facilities should be located in areas where the risk of contamination by biological, chemical, or physical food safety hazards is minimized and where sources of pollution can be controlled. Potential sources of contamination from the surroundings (e.g. agricultural farms, industries, sewage) should be evaluated and considered and management measures should be put in place to control risks. Aquaculture should not be carried out in areas where the presence of potentially harmful substances would lead to an unacceptable level of such substances in aquaculture products.	Harvest plans and/or depuration can ensure a safe product even if potentially harmful substances are present. There is always risk of contamination in an open marine environment; therefore, there should be some provision that contingency plans and/or mitigation are acceptable.
35. All veterinary drugs and chemicals for use in aquaculture should comply with national regulations and international guidelines. Wherever applicable, veterinary drugs and chemicals should be registered with the competent national authority. Control of diseases with drugs should be carried out only on the basis of an accurate diagnosis. Products should only be prescribed and distributed by personnel authorized under national regulations. Authorised veterinary drugs and chemicals or medicated feeds should be used according to the instructions of the manufacturer or other competent authority, with particular attention to withdrawal periods. Banned antibacterials, veterinary drugs and/or chemicals should not be used in aquaculture production, transportation or product processing.	Same comments as for article 32.
39. Aquaculture facilities and operations should maintain good culture and hygienic conditions, including: • Good hygiene practices in the farm surroundings should be applied aiming at minimizing contamination of growing water, particularly from waste materials or faecal matter from animals or humans. • HACCP principles should be applied during culture to ensure good hygienic culture conditions and safety and quality of aquaculture produce. • Farms should institute a pest control programme, so that rodents, birds and other wild and domesticated animals are controlled, especially around feed storage areas. • Farm grounds should be well maintained to reduce or eliminate food safety hazards. • Equipment such as cages and nets should be	More specific language should be used here to clarify whether farms are required to develop HACCP plans (which would require extensive training) or that a HACCP-like approach should be taken (and if so, how that would be applied and measured). Insects and sea-lice should be included as pests. With regard to quarantine, references to zoning, declaration of freedom, biocontainment and regionalization should be added.

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designed and constructed to ensure minimum physical damage of the animals. • All equipment and holding facilities should be easy to clean and to disinfect and should be cleaned and disinfected regularly and as appropriate. • Diseased aquatic animals should be quarantined when necessary and appropriate and dead animals should be disposed of in a sanitary manner. • Appropriate techniques for harvesting, storing and transportation of aquaculture products should be applied to minimize contamination, physical damage and stress.	
Environmental Integrity 42. Aquaculture should be planned and practiced in an environmentally responsible manner, in accordance with appropriate national and international rules and regulations.	These guidelines should be more generic and less prescriptive, given that many States already have in place various environmental regulations, requirements, policies and laws. The outcome should be the key criterion for certification, not the specific mechanisms and tools by which such a goal is achieved. Less prescriptive guidelines would bring the document into conformity with the FAO marine eco-labelling guidelines, and respects state policy sovereignty on <u>how</u> to achieve particular <u>outcomes</u>.
~~43. Aquaculture can impact on the environment in various ways including: a) biodiversity, habitats and ecosystems, b) genetic diversity including GMOs, c) endangered species, exotic species, alien and migratory species, d) natural fish stocks and species and the associated ecosystems, and e) water, soil and air quality. Aquaculture certification schemes should ensure these impacts are identified and managed or mitigated to an acceptable level.~~	There is no definition of "acceptable level" in the guidelines and no indication as to who might set the acceptable level.
~~44. Management practices that address environmental impacts of aquaculture differ substantially for different types of scale of aquaculture and for different aquaculture farming systems. Certification schemes should not be overly prescriptive, but set measurable benchmarks that encourage improvement and innovation in environmental performance of aquaculture.~~	The minimum standards for management practices to address environmental impacts should be the same, regardless of the different scales or systems of aquaculture operations.

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~~46. Use of "Risk Analysis", i.e. relevant uncertainties should be taken into account through a suitable scientific method of assessing the likelihood and magnitude of impacts. Appropriate reference points should be determined and remedial actions taken if reference points are approached or exceeded.~~ **Risk analysis should be performed that takes into account relevant uncertainties through a suitable scientific method of assessing the likelihood and magnitude of impacts. Appropriate reference points should be determined and remedial actions taken if reference points are approached or exceeded.**	Precautionary approach is an application of risk analysis, thus article 45 should be deleted and article 46 should be revised.
~~47. "Polluter Pays" principle, i.e. those who cause pollution or contamination are responsible for its effects and compensate for the damage incurred and/or rehabilitation efforts and by taking measures to avoid creating further pollution, which apply up to the limits prescribed by national and international laws.~~	It is a policy decision of a sovereign State to determine how to mitigate pollution. Including this provision could result in a perverse outcome where a clean aquaculture facility does not receive certification because the government jurisdiction responsible for mitigating pollution uses other policy tools (e.g., bans, laws) to ensure pollution is minimized.
Minimum substantive criteria for addressing environmental integrity in aquaculture certification schemes: 51. Routine monitoring of on-farm and off-farm environmental quality, combined with good record keeping, **and** use of appropriate methodologies ~~and community participation~~.	The governance of "community participation" is not necessary for certification of a <u>product</u>.
56. Minimise ~~escape~~ **<u>unintentional release</u>** of all cultured species into natural habitats.	
58. Exotic species are only used when they pose low potential risk to the natural environment, biodiversity and ecosystem health.	A definition of "low potential risk" should be added.
~~59. Non-use of GMOs genetically altered species that risk compromising biodiversity and human health.~~	
Articles 60-63 [delete these Articles]	As indicated earlier, there is no internationally accepted definition of what is considered to be "responsible" or "responsible use." Inclusion of these provisions could create a barrier to trade.

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~~**Social Responsibility**~~ Articles 64 to 74 [delete these Articles]	If the same expectations are not codified in the eco-labelling guidelines for marine capture fisheries), the question remains why the aquaculture sector would be assessed against these social outcomes. As discussed earlier, some of the expectations with respect to social responsibility and responsible trade outlined in the guidelines have been the subject of international policy debate for many years, without conclusion. As such, it is not clear how these criteria would be demonstrated and measured, and thus could create a barrier to trade. This is an example of how these draft guidelines would lead to the certification of government policy, rather than the certification of the rigour of the management regime and the <u>product</u> entering trade.
INSTITUTIONAL AND PROCEDURAL REQUIREMENTS 77. The guidance presented here draws on other internationally accepted guidance, especially those produced by the International Organization for Standardization (ISO) and the International Social and Environmental Accreditation and Labeling Alliance (ISEAL), and the Codex Alimentarius Commission (CAC). **<u>Any certification scheme implemented pursuant to these guidelines must conform with a country's WTO commitments, particularly those under the WTO Agreement on Technical Barriers to Trade and the Agreement on the Application of Sanitary and Phyto-Sanitary Measures.</u>**	Suggest adding ISO/CASCO, IAF and ILAC as well as language about conformity with WTO.
Standard Setting ***Purpose*** ~~83. Standards provide the necessary requirements, the quantitative and qualitative criteria and ….environmental integrity and/or social responsibility in aquaculture.~~ **<u>83. Standards comprise quantitative and qualitative indicators of the governance system or management regime of aquaculture. Standards should reflect the objectives and outcomes that are being pursued through the certification scheme.</u>**	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.

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Normative basis 84. The normative basis for development of standards includes the following existing documented procedures: • WTO Agreement on technical barriers to trade • ~~WTO TBT. Annex 3 *Code of Good Practice for the Preparation, Adoption and Application of Standards.*~~ • WTO Agreement on the application of sanitary and phytosanitary measures • Codex guidelines on food import and export inspection and certification systems • ISO/IEC Guide 59. *Code of good practice for standardization*. 1994. • ~~ISO Guide 62. *General Requirements for bodies operating assessment and certification/registration of quality systems.* 1996.~~ • ISO/IEC Guide 65. *General requirements for bodies operating product certification systems*. 1996. • ISEAL. *ISEAL Code of Good Practice for Setting Social and Environmental Standards.* 2006. • **ISO/IEC 17021. *Management Systems certification.*** • **ISO/IEC 22003. *Food safety management systems.*** • **ISO/IEC 17025. *Laboratory testing.*** • **ISO/IEC 22005. *Chain of Custody.*** • **OIE Aquatic Animal Health Code/ Guidelines.**	The first two bullets refer to the same agreement. It should also be noted that Guide 62 is cancelled. Five items can be added under the normative basis.
87. A standard setting body or entity must be a legal entity, with sufficient resources to support its standard setting function. The process should include adequate stakeholder representation. Governance, administration and other support staff should be free of conflicts of interest.	This article could be made more specific that the technical product certification standards, the laboratory testing standards, the management systems standards shall be developed by a standards development body (e.g., ISO, IEC, etc.) and/or industry or government body.

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Requirements **<u>Transparency</u>** 88. Transparency in the setting of standards is essential. Transparency helps ensure consistency with relevant ~~national and~~ international standards and facilitates access to information and records pertaining to certification and participation of all interested parties, including those of developing countries and countries in transition, particularly small-scale stakeholders. ~~Special effort should be made to ensure adequate participation of relevant stakeholders in the standard setting process. Stakeholder participation in the standard setting process should not be restricted and open to comment.~~	National standards vary and may not be consistent with each other. The last two sentences repeat the same message.
90. ~~On a regular basis as appropriate~~ **<u>At least once every six months</u>,** the standards setting body or entity should publicize its work programme ~~as widely as possible~~ **containing:** • **its name;** • **its address;** • **the list of standards currently under preparation;** • **the list of standards currently under reviewing or revision;** • **the list of standards which were adopted in the preceding period.**	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
90bis A notice of existence of the work programme should be published in a national or, as may be, regional or international publication of standardization activities and/or should be accessible on the Internet whenever possible.	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
91. On the request of any interested party, the standards setting body or entity should provide, or arrange to provide, within reasonable time, a copy of its standard setting procedures, most recent work programme, draft standards or final standards.	As drafted, this article could be interpreted to mean that a standards setting body must provide a final standard free of charge. It should be noted that the TBT Agreement provides that standards setting bodies may request a reasonable fee for its standards, as long as the same fee is applied to all WTO Members.

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Participation by interested parties 93. The standards setting body or entity should strive to achieve balanced participation by independent technical experts and by representatives of interested parties in the standards development, revision and approval process. Interested parties include representatives of the aquaculture industry (input suppliers, producers, processors, traders and retailers), aquaculture workers organizations, the scientific community, community groups, environmental interest groups, ~~accreditation and certification bodies~~, consumer groups, governments and governmental organizations.	To avoid conflict of interest, accreditation bodies should have no role in the development of standards or conformity assessment procedures implemented by bodies whose competence they are required to assess. Similarly, conformity assessment bodies should not be in a position to influence the development of standards since this could be seen to create business opportunities for the bodies. Standards of good governance require the independence of third parties from the activities they accredit or assess.
Content and comparable systems 95. The standards setting process should seek to: • Include international reference standards in animal health ~~and welfare~~, food safety and quality, environmental integrity and ~~social responsibility~~. • Identify and review comparable systems. • Identify research needs and knowledge gaps. • Include requirements of relevant international agreements. • Engage in mutual recognition and equivalence agreements.	
Notification provisions 96. Before adopting a standard (s), the standards setting body or entity should allow ~~a period of an appropriate duration~~ **a period of at least 60 days** for the submission of comments on the draft standards by interested parties. No later than the start of the comment period, the standard setting body or entity should publish a notice announcing the period for commenting in a national or, as appropriate, regional or international publication of standardization activities and/or on the Internet.	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.

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Validation of standards 102. In developing and revising standards, an appropriate procedure should be put in place to corroborate the standard vis-à-vis the minimum requirements for aquaculture as laid out in these guidelines. Validation is also required to ensure that standards: • are meaningful, objective and auditable. • do not contain criteria or requirements that could cause unnecessary barriers to trade or mislead the aquaculture community. • ~~take into consideration practicality and cost of standards development and maintenance.~~	
Accreditation ***Purpose*** 103. Accreditation provides assurance that certification bodies responsible for conducting conformity assessments according to standards for aquaculture in relation to animal health ~~and welfare~~, food safety and quality, environmental integrity ~~and social responsibility~~ are competent to carry out such tasks. Accreditation provides assurance that the certification body or entity is able to assess and certify that a specific aquaculture product, method or process comes from a certified aquaculture operation and conforms to the standards.	
Requirements Guidelines **Non-discrimination** 107. Full recognition should be given to the special circumstances and requirements of certification bodies in developing countries and countries in transition including financial and technical assistance, technology transfer, and training and scientific cooperation~~, without compromising the integrity of the accreditation and certification process.~~	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.

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Requirements Guidelines **Maintenance and extension of accreditation** 131. Accreditation should be re-assessed at sufficiently close intervals or as necessary to verify that the accredited certification body or entity continues to comply with the accreditation requirements. The periodicity for carrying out reassessments should ~~be appropriate~~ **not exceed five years.**	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
Certification ***Normative references*** • WTO Agreement on technical barriers to trade • WTO TBT. Annex 3 *Code of Good Practice for the Preparation, Adoption and Application of Standards.* • WTO Agreement on the application of sanitary and phytosanitary measures • Codex guidelines on food import and export inspection and certification systems • ISO/IEC Guide 59. *Code of good practice for standardization*. 1994. • ~~ISO Guide 62. *General Requirements for bodies operating assessment and certification/registration of quality systems.* 1996.~~ • ISO/IEC Guide 65. *General requirements for bodies operating product certification systems*. 1996. • ISEAL. *ISEAL Code of Good Practice for Setting Social and Environmental Standards.* 2006. • **ISO/IEC 17021. *Management Systems certification.*** • **ISO/IEC 22003. *Food safety management systems.*** • **ISO/IEC 17025. *Laboratory testing.*** • **ISO/IEC 22005. *Chain of Custody.*** • **OIE Aquatic Animal Health Code/ Guidelines.** • **TBT Articles 5-6. *Conformity Assessment***	The same normative references should be used here as in article 84. Canada suggests adding the last five normative references.
Requirements **Human and financial resources** 153. The certification body or entity should employ a sufficient number of personnel having the necessary qualifications, training, technical knowledge, **education** and experience for performing conformity and/or chain of custody assessments in aquaculture.	

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157bis. The certification body should have: • **Defined objectives and commitment to quality;** • **Policies and procedures for quality documented in a quality manual;** • **An established effective, appropriate system for quality.**	To be consistent with the eco-labelling guidelines, an article about quality should be added.
Certification fees 162. If the certification body or entity charges fees, it should maintain a written fee structure for applicants and certified aquaculture operations that should be available on request. In establishing the fee structure and in determining the specific fee of certification, the certification body or entity should take into account, *inter alia*, the requirements for accurate and truthful assessments, the scale, size and complexity of the aquaculture operation or chain of custody, the requirement of non-discrimination of any client, ~~and the particular circumstances and requirements of small-scale farmers, developing countries and countries in transition~~.	Issues related to small-scale farmers have been addressed more generally in other sections of the guidelines.
168. The period of validity of a certificate should ~~be appropriate~~ **not exceed five years** for an aquaculture operation and **three years in the case of** a chain of custody. The assessment required for re-certification should give particular attention to changes made in the conduct of the aquaculture operation or in the management practices.	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
168bis. Entities/units being certified should be given a period of at least three years to respond to major changes in procedures, through use of conditions of certificates.	Canada suggests adding a reference to conditions is important for consistency with both international trade rules and capture fishery certification.
Renewal of certification 169. On the basis of proper monitoring and auditing, the validity of certification ~~should be renewed up to an agreed period~~ **can be renewed up to the time limits of five years in the case of an aquaculture operation and three years in the case of the chain of custody.**	As indicated earlier, the text is revised in order to be consistent with the eco-labelling guidelines. If a different approach is necessary, then further discussion is required as to the reason.
Articles 189 to 192 IMPLEMENTATION [delete these Articles]	"Implementation" may be the wrong word since this section does not appear to address the implementation of the technical guidelines. Rather, it sets out how international organizations and national governments will work to supply a variety of assistance to developing

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	countries in the field of aquaculture certification. It is preferable that issues specifically related to implementation to be addressed in a separate document. A general statement, such as below from the eco-labelling guidelines, could be added at the beginning of the document to acknowledge the importance of providing assistance to developing countries: **In accordance with Article 5 of the *Code of Conduct for Responsible Fisheries* and in view of the special conditions applying to developing countries and countries in transition, it is acknowledged that in order to benefit from applying certification schemes, parties could consider providing developing countries and countries in transition with financial and technical assistance to assist in the development of certification schemes pertaining to aquaculture. Developing countries are encouraged to highlight the need for technical assistance to international organizations, such as the World Trade Organization Committee on Technical Barriers to Trade. Development agencies and donor institutions are encouraged to support the FAO in facilitating financial and technical assistance to developing countries and countries in transition.**