

TECHNICAL GUIDELINES ON AQUACULTURE CERTIFICATION: COMMENTS  
OF GOVERNMENT OF INDIA

- 1 Para 14-17: While the guidelines are quite comprehensive there is no mechanism to ensure that the different entities involved in certification are actually following the guidelines. Perhaps the FAO could evolve a mechanism for this .For standard setting and accreditation bodies which are to play a vital role FAO could evolve an audit programme to verify compliance with the guidelines.
- 2 Para 19: Social responsibility should not form part of the minimum substantive criteria as it is a subjective criterion and also socio-culture specific.
- 3 Para 24: This part should not be interpreted to mean that the use of SPF stock is compulsory .While in shrimp, the use of SPF Vannamei broodstock is widespread, the development of SPF black tiger broodstock is still in infancy. The use of SPF brood stock should be a desirable condition and not an essential condition.
- 4 Para 43: This provision is too sweeping and general. It conveys the impression that aquaculture has only strong negative impact on environment. The Para should be deleted; or in the alternative made focused and specific so as not to make it a constraint to aquaculture.
- 5 Para 47: This issue is best addressed through National legislations and therefore, should be deleted.
- 6 Para 64-74: The minimum substantive criteria under Social Responsibility could easily be used to deny certification to not only individual farmers but even the whole sector in underdeveloped countries. While the guidelines make it clear there should not be any barrier to trade in the name of certification, there is real danger of this happening. Socio economic issues relevant to certification should be identified carefully and in the relevant contextual framework. Even when such criteria are included, there must

be some objectively verifiable indicators .The criteria given at 65, 66, 67 are very general in nature. Similarly Para 71, 72, 73, 74 cannot be strictly called “criteria” They look like broad ideals which are desirable. It may be difficult to incorporate these in the guidelines as “criteria.”

- 7** Para 108 &112: The last bullet point under 108 says that an accreditation agency should not delegate authority for granting, maintaining, extending, reducing, suspending or withdrawing accreditation to an outside person or body. Para 112 talks about subcontracting work related to accreditation to an external body or person. Some clarity is required on this.