

**Comments on
Draft Technical Guidelines on Aquaculture Certification**

Department of Fisheries, Thailand.

In principle, Thailand is of the opinion to support the development of technical guidelines on aquaculture certification conducted by FAO through six expert consultations in various parts of the world both in producing and buying countries. Various countries including several producing and buying countries participate the consultations. Some countries like Thailand, Brazil, India, China, the United Kingdom and the United States even host the meetings. Considerable efforts and resources have been contributed in the last two years to the series of consultations from all parties involved governments, inter-governments and NGOs. We found the technical guidelines are reasonable, comprehensive and useful and we can go along with the drafted guidelines. It is also quite timely to have such guidelines as it would lscale farmers. In turn, it will contribute to the global aquaculture industry as a whole.

We have a couple minor comments as follows:

- (1) (para 5 page 3) Definition of BMP(s) in the guidelines may obstruct the using of other terms in the existing certification schemes such as BAP, GAP, Code of Conduct etc. We believe that the meanings of all these terms are based on the same principle with BMP(s). The suggestion is the guidelines should be added a sentence to explain that **“other terms (no need to show an example) that have been widely used and based on the same principle are also equivalent to BMP(s)”**.
- (2) (para 59) “Non-use of GMOs” is not clear that it covers the use of GMOs product such as GM soybean or not. If it is covered, the price of aquafeed will increase by the using Non GM products. This, in turn, will affect feed industry (in using non GMOs soy bean) and higher cost of feed use by farmers particularly small scale farmers. This para might create difficulty to accept, if it does affect the industry and farmers.