

### **Comment From the Department of Fisheries (DOF) Thailand**

According to the proposed protective regulations under Endangered Species Act that the importation of Banggai cardinalfish from foreign countries will be prohibited while the interstate commerce activities are still permitted. Similar to the US that presently in Thailand, the Banggai cardinalfish is already in place, however, in our case, the precise data of the current existing Banggai cardinalfish in domestic farm is recorded 15,000 individuals. All of these 15,000 fish are produced<sup>3</sup>

from the first generation of introduction from Indonesia since 2012. The production from the farm are for both domestic and international trades, and the broodstocks are selected and maintained for further breeding. As a consequence, the additional importation of broodstock from Indonesia for breeding has not taken place after then. Therefore, we have the precise information to suggest that whether domestic or international commerce activities from the farm certified by the government authorities certainly is not associated with threats to Banggai cardinalfish or would negatively affect any efforts aimed at the recovery of wild populations of the species. Even though Department of Fisheries (DOF Thailand) supports the enforcement of the proposed protective regulation as to protecting fish in a wild, we have the strong view that there should have some rooms for inter trading of Banggai cardinalfish from the farm which are certified by the state authorities that those fish are not associated with threats to Banggai cardinalfish or would negatively affect any efforts aimed at the recovery of wild populations of the species. We believe without any doubt that the permit for international trading with that condition will not only significantly reduce demand and pressure to the wild population but also to enhance the recovery of wild populations of the species. Last but not least The Department of Fisheries of Thailand certify that the farm follows the Aquaculture Control System and the export control as following.

#### **The Aquaculture Control System**

Aquaculture farmers are required to register with the department of Fisheries then to receive the Good Aquaculture Practice (GAP) certification. In the process of inspection for GAP Certification, the farm will be inspected for good farm management, the use of fry of known origin. Also feeds, medicines, chemicals, and production factors must be properly registered with government agencies. The quality of water used for raising is within the appropriate criteria and farmers must keep records of fish farming activities on their farm regularly. When the results of the farm assessment pass, farm will be certified with GAP standards for 3 years and the Department of Fisheries will inspect farm at least once after receiving certification. The traceability system for the products from coastal aquaculture farms can be obtained from the Aquatic Animal Fry Movement Document (FMD) and the Aquatic

Animal Movement Document (MD). The farm must prepare the FMD and MD every time aquatic animals are traded. This is to ensure that aquatic animals banggai cardinalfish from this farm are all from aquaculture with are efficiency and responsibility and follow the traceability system.

### **The procedure for export control**

#### ***Pre-export procedure***

1. The exporter will submit an application for aquatic animal export and attached with required documents via the Department of Fisheries electronics system

(1) Copy of Invoice

(2) Copy of Packing list

(3) Copy of documents to identify the origin of aquatic animal (Aquaculture)

2. The officer considers and examines the export application and attached documents. If they are in accuracy, consistency and meet requirement, the officer will issue export permit to the applicant. Each export permit is applicable only to the shipment requested and can be valid within 15 days.

#### ***Export procedure***

1. The exporter informs the departure of the shipment and present the export permit which issued by the Department of Fisheries as well as the original documents mentioned above to the officer.

2. The officer inspects species and quantity of fishery goods to verify their compliance with the data specified in all attached documents.

3. Fishery goods will be systematically assessed under risk management. If it is correct the officer will release goods to export to destination.

To accompany our comment, the files of the overview information on the Aquaculture Control System and export control system are also attached herewith for your consideration. We are more than pleasure to provide additional data and information if needed.