

29 January 2016

Via email: originlabelling@industry.gov.au

Country of origin labelling taskforce
Portfolio Strategic Policy Division,
Department of Industry, Innovation and Science
GPO Box 9839
Canberra ACT 2601

RE: Consultation on Country of Origin Labelling

Northern Territory Seafood Council is the peak representative body for the wild catch, aquaculture and trader/processor seafood sectors in the Northern Territory, with the exception of the Northern Prawn Fishery. NT Seafood Council membership represents some \$60 million gross value product a year and over 220 seafood businesses.

NTSC's vision is for a profitable, sustainable seafood and aquaculture industry supporting the economic growth of the Northern Territory. The NT seafood industry provides:

- Regional employment
- Export income
- Cost effective monitoring of the marine environment
- Economic diversification and resilience for regional communities
- Healthy, high quality and sustainably sourced food
- Consumers with the pleasure of freshly harvested, premium quality and tasty seafood
- Contributes to the NT tourism industry through the provision of iconic species such as mud crab, barramundi and tropical snappers.
- Contribution's to Australia's future food security.

The NT Seafood Council supports the Australian government's policy that consumers should have sufficient information to enable them to make informed choices about the food they consume, including its origin. In this the NT Seafood Council is actively seeking mandatory Country of Origin Labelling (CoOL) for seafood to ensure the consumer is always able to make informed choices about their seafood.

Since June 2006 it has been a legal requirement for packaged and certain unpackaged seafood sold to the Australian public must be clearly labelled with its Country of Origin. These regulations were introduced by the Federal Government to ensure the Australian consumer be accurately informed about the origin of their seafood. This mandatory requirement has received considerable community support.

As a result of this mandatory labelling requirement and demand from consumers for Australian produce, Australian produced Atlantic salmon and Red snapper species are now the largest selling fish in the two major supermarkets in a number of Australian states.

Unfortunately the Country of Origin requirement is not binding on seafood sold to the public by restaurants, canteens, schools, caterers or self-catering institutions or catering packs where the majority of seafood is sold to the Australian public.

The Northern Territory Government introduced regulations in November 2008 to make it a requirement for all venues to identify imported seafood at the point of sale to the consumer. With this improved level of labelling at the dining outlets, the reaction from the consumer was first one of shock to find out that the majority of iconic NT species barramundi sold around the Territory was not local and in fact imported product.

The improved labelling requirement has gained considerable public support and has already seen many restaurants moving to use local product based on the demands of the consumer.

As highlighted in a national review of food labelling law and policy, *Labelling Logic - the Final Report of the Review of Food Labelling Law and Policy* (Department of Health and Ageing, 2011), it was identified that food labels are an intensely complex area but are highly valued as a communication option for healthy choices and consumer value information. The report noted that food labelling has four areas of consideration, food safety, preventative health, new technologies and also consumer values. Consumer values relates to consumers' personal values and allows them to make decisions that take into account animal welfare issues, religious beliefs, environmental issues, human rights and Country of Origin.

In the remainder of Australia, the loophole in the mandatory CoOL for seafood continues to allow for the systematic deception of the Australian consumer in relation to their choices in regards to seafood consumption. Mandatory labelling for country of origin for seafood throughout the supply chain will ensure that the consumer is not misled and to ensure the viability of Australia's seafood producers (both wild harvest and farmed).

Australian consumers both resident and visitors alike have shown a strong preference for Australian produced seafood. Furthermore, consumers assume that the seafood they are consuming at dining outlets and take away venues is Australian.

It is estimated that over 70% of the seafood consumed in Australia is imported¹ and that while the value of imports has remained consistent since 1999–2012, volume has increased by around 50 per cent².

The broad perception that the majority of seafood sold and consumed in Australia is Australian has been used by venues not required to state the Country of Origin to mislead seafood consumers. The deception is demonstrated easily by the species being imported – barramundi, red emperor, whiting, flathead, Spanish mackerel, prawns, squid – this list goes on - all species produced within Australia and assumed by the consumer to be Australian product.

The NT Seafood Council believes it is incumbent on government to mandate compulsory CoOL for the entire seafood supply chain to ensure this deception is removed.

Voluntary labelling such as “*local* barramundi and chips” is seen no differently from another venue selling “barramundi and chips”. This is due to the perception of the consumer that most seafood is produced in Australia. Only a mandatory country of origin or imported label will identify imported or locally produced seafood to the consumer.

¹ Ruello, 2011. *A Study Of The Composition, Value And Utilisation Of Imported Seafood In Australia*. FRDC Project 2010/222. Available online http://frdc.com.au/research/Documents/Final_reports/2010-222-DLD.pdf

² Department of Agriculture, 2013. *Australia's seafood trade*. Available online http://www.daff.gov.au/data/assets/pdf_file/0005/2359643/aus-seafood-trade.pdf

There is considerable financial benefit and incentive for some venues to not inform the consumer their seafood is imported. For these reasons alone the consumer will continue to be misled without mandatory labelling requirements. There is no rationale to allow the consumer to be misled in this way and in addition to this the increasing level of imported seafood is negatively impacting the Australian industry.

This is a key priority for the seafood industry and we take this opportunity to again reiterate our support for the following:

RECOMMENDATIONS

1. Create a specific section in the *Competition and Consumers Act* that deals solely with country of origin claims with regard to food.
2. Maintain the current requirement for Country of Origin labelling.
3. Extend the Country of Origin labelling requirements to seafood sold for immediate consumption (i.e. restaurants, canteens, schools, caterers or self-catering institutions or catering packs);



Rob Fish
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