



Country of Origin Labelling Taskforce
Portfolio Strategic Policy Division,
Department of Industry, Innovation and Science
GPO Box 9839,
Canberra ACT 2601

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Email: originlabelling@industry.gov.au

RE: Australian Barramundi Farmers Association (ABFA) Submission on Proposed Country of Origin Labelling (CoOL) in Australia.

The Australian Barramundi Farmers Association (ABFA) is the peak body that represents the interests of over 90% of the commercial production of barramundi farmed in Australia. Members produce around 6,000t of barramundi valued at some \$60 million annually, from farms in all mainland states and the Northern Territory. The ABFA is an advocate for increasing seafood consumption in Australia and truth in its labelling. ABFA seek to ensure that there is effective and mandatory Country of Origin Labelling (CoOL) so that consumers, including diners in any venue, can make informed decisions regarding their seafood meal choices.

The ABFA, as a first step, does not object to the much of the current proposal for simplified CoOL for packaged goods as outlined in the Regulation Impact Statement, but notes that it falls short of meeting the needs of both consumers and the producers of Australian seafood. The ABFA does not support specifically exempting seafood that is sold for immediate consumption under Part 2, Division 1, Section 14(2) of the proposal. The ABFA believe that until the unanimous findings of the Senate Committee Rural and Regional Affairs and Transport References on Labelling of Seafood and Seafood Products are adopted, the labelling system is deficient. Under this current proposal, which continues the exemption for seafood sold for immediate consumption, consumers and producers are not seeing the full benefits that can accrue to Australia from CoOL when it is adopted for seafood from the producer to the plate.

At this stage the ABFA are unsure of the full implications of moving CoOL requirements from the Food Standards Code to Australian Consumer Law (and as such can't support it). Importantly as an overarching premise, the ABFA does not support any changes to legislation that weakens the current requirements for labelling of seafood in the market. After careful consideration, the ABFA will provide their formal position on this matter as part of the current FSANZ consultation (Proposal P1041) on transferring country of origin requirements to Australian Consumer Law.

The ABFA are happy to provide any additional information that may be required in this matter. Please feel free to contact me via the contact details below.

Yours sincerely

Chris Calogeras

Executive Officer - Australian Barramundi Farmers Association

Australian Barramundi Farmers Association

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