



28 January 2016

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

Consultation Regulation Impact Statement - Country of Origin Food Labelling Information Standard 2016

The Master Fish Merchants' Association of Australia (MFMA) is a not for profit organisation established in the 1930's that represents businesses in the post-harvest sector of the seafood industry. The MFMA's membership includes some 180 businesses in New South Wales, Queensland, South Australia, Victoria and Western Australia, which operate as seafood retailers and wholesalers.

The MFMA would like to provide the following input on the *Country of Origin Labelling Consultation Regulation Impact Statement* as it pertains to fresh seafood retailers.

Fresh domestic seafood products are the main stay of seafood retailers across Australia. Seafood retailers typically sell unpackaged seafood products to the public from refrigerated assisted service displays. The vast bulk of products sold by seafood retailers are whole products such as fish, prawns, oysters, calamari, mussels or minimally processed products such as fish fillets.

The MFMA believes that the proposed changes set out in the *Consultation Regulation Impact Statement* that would require a percentage bar chart and kangaroo logo on labels in addition to a country of origin statement for unpackaged domestic seafood products are excessive and unnecessary. In the case of unpackaged seafood sold by seafood retailers the proposed changes would provide no more clarity to consumers than the current country of origin statement.

The typical product label used by seafood retailers to sell unpackaged seafood contains minimal information - the shop logo, name of the product and the country of origin. As such, country of origin statements clearly stand out as they are not obscured or diminished by the presence of other images, visuals or text based information as is the case for packaged products. This means that consumers can already clearly see and identify the country of origin of the products at the point of sale.

Additionally, should a consumer require further information or clarification on any aspect of the origin of seafood they are intending to purchase it can easily be sort from sales staff prior to purchase.

The proposed changes will however result in additional costs to retailers in terms of an initial replacement of their current labels as well as higher ongoing replacement costs in the future due to the additional information required to be printed on labels.

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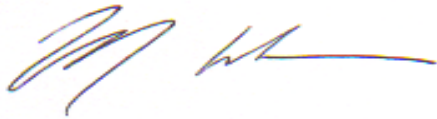
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Final Comment

While the proposed changes may be beneficial to consumers in relation to packaged products, this is not the case in regard to unpackaged seafood products. Seafood retailers already face an additional regulatory burden from country of origin labelling legislation which is not required of businesses that sell seafood for immediate consumption. The requirement for a bar chart and logo will result in an additional cost of doing business with no significant benefit to the consumer in terms of providing greater clarity regarding the country of origin of the products they purchase from seafood retailers.

The MFMA recommend that in regards to unpackaged seafood products the current country of origin labelling requirements as set out in Standard 1.2.11 in the Australia New Zealand Food Standards Code be retained unchanged in the new standard and that the requirement for the inclusion of a bar chart and logo being restricted to packaged products.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M Kitchener', with a long horizontal flourish extending to the right.

Mr Michael Kitchener
Executive Officer
The Master Fish Merchants' Association of Australia