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IMPORTATION OF ILLEGAL, UNREPORTED AND UNREGULATED SEAFOOD

The Western Australian Fishing Industry Council (WAFIC) is the peak body for commercial fishing in Western Australia (WA), including pearling and aquaculture. As the largest seafood industry body in Australia, we hereby provide this submission to government with regard to the importation of illegal, unreported and unregulated (IUU) seafood.

Proceed with caution

We are aware of representations by the Fair Catch Alliance to introduce various measures to address the importation of IUU products and while there is broad general support from WAFIC for the tighter management of sourcing of sustainable products, traceability, supply chains and labelling, we urge the government to proceed cautiously to avoid a range of unintended consequences - both domestically and internationally.

Firstly, we fear that the early institution of import controls as proposed by the Fair Catch Alliance may have perverse impacts upon local seafood availability (food security) and prices. Furthermore, we hold concerns that restricting the flow of imported seafood – in the absence of coordinated international action - will not lead to the reduction of unsustainably sourced seafood. Instead there is every likelihood that the products will be diverted to an alternative jurisdiction which does not have such restrictions.

Domestic demand cannot be met from locally sourced supplies

Obviously, a body such as WAFIC is an active promoter of the virtues of locally caught seafood and for good reason – over 91% of seafood caught in WA is independently certified as sustainable by the international Marine Stewardship Council (MSC). The fisheries management regime in WA is world-class and supported by science and strict sustainability parameters. The product quality of WA sourced seafood is unrivalled.

Having said that, the volume of seafood provided to the local market goes nowhere near meeting domestic demand. This is reflected in data which shows that 30% of local consumption is from WA waters, while over 70% is being imported. This ratio has not been arrived at through competitive pressures; it is simply because we supply as much as we can (30%) while the rest of demand is then met from imports (70%).

It is important to note that WA exports virtually no wild-caught fish products whatsoever. The exports come from sectors which catch seafood which is in volumes the local market demand could never meet, such as western rock lobster and abalone.

The spatial squeeze

To exacerbate matters, the WA seafood industry is currently experiencing a phenomenal change in its operating environment, with a rush of coastal industrial projects being proposed – these include: offshore windfarms, oil & gas projects, evaporative solar salt projects, desalination plants, hydrogen hubs. The cumulative impacts will see considerable areas of highly productive waters being lost to commercial fishing, with direct consequential impacts upon the supply of seafood to the local market.

In addition, the WA state government is looking to lock significant areas of valuable waters away into marine park sanctuaries, once again depriving the WA community of seafood supplies – and thereby encouraging the further increase of imported products.

Therefore, the proposals of the Fair Catch Alliance will restrict imports at the very same time that local catches are being reduced – with all sorts of potential flow-on impacts upon local market supply and prices.

Local seafood prices

There is also a price differential at play, as premium quality local seafood is always in high demand and attracts bidding competition in the markets, to the extent that in WA the prices of fish fillets are much higher than other premium protein sources such as red and white meats. Conversely, the imported fish products are significantly cheaper due to lower production costs and high economies of scale.

WAFIC does not see these two supply streams as incompatible, because both local and imported seafoods play important roles for different classes or interests of consumers. What we are most concerned about is the need to clearly label the source of the fish so that consumers can make their own informed choice as to whether or not to purchase.

We see that is critically important for the market to have integrity in the labelling system (and thereby traceability) to prevent product substitution, and know that if lower quality imports are marketed as high-priced local foods then the confidence in the local foods will quickly evaporate.

Furthermore, we hold concerns that restricting the flow of imported seafood – in the absence of coordinated international action - will not lead to the reduction of unsustainably sourced seafood – instead there is every likelihood that the products will be diverted to an alternative jurisdiction which does not have such restrictions.

Need for market analysis and socioeconomic impacts

Therefore, it is dangerous to proceed without an in-depth study to develop a thorough understanding of the local production, consumption patterns, supply chain dynamics and prices of both local and imported seafoods.

Alternative approach

As an alternative, Australia can play a key role in managing IUU activities through demonstrating global leadership on the international stage. Australia unquestionably has world-class marine scientists who could be used to develop a global network of specialists operating through the United Nations (such as FAO) to help third-world countries develop higher regulatory standards of environmental care in sustainable seafood capture, supply chain management, traceability and workplace ethics.

This would deliver a holistic solution to a global problem, in contrast to the proposal by the Fair Catch Alliance which, while well-intended, is unlikely to save the lives of a single fish or fisher.

Summary

While we see that it is important to take action globally to eradicate unsustainable fishing practices, those which damage habitats or utilise unethical workplace practices, we do not necessarily see that excessive import controls into Australia will lead to systemic adjustment to deliver satisfactory outcomes on a global scale.

Instead, we would see the practices continue in an unregulated way, particularly in third-world jurisdictions with minimal controls or institutional wherewithal to manage catch activities. The inevitable result would see the IUU or unsustainably sourced seafoods being redirected to alternative markets in Africa, Asia or South America which have minimal import restrictions.

So, we support the principle of managing global unsustainable fishing practices, but this should be done carefully and holistically, with extensive international coordination and utilising the best scientific resources of countries such as Australia.

Without synchronised and coordinated actions by all importing countries, the IUU practices will persist while Australian market prices and supplies are significantly influenced. Any attempts to bring in import restrictions in Australia should only be considered after a comprehensive supply and demand study is conducted for the Australian market and actions can be planned to deal with the projected impacts.

Yours sincerely



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