

SEAFOOD INDUSTRY AUSTRALIA



**Seafood Industry Australia submission
to the discussion paper on
measures to prevent the importation of
Illegal, Unregulated and Unreported
seafood into Australia**

June 2023

To the Department of Agriculture, Fisheries and Forestry
Submitted [REDACTED]
on 26 June 2023

Seafood Industry Australia (SIA) welcomes the opportunity to provide feedback on the discussion paper on measures to prevent the importation of illegal, unreported and unregulated seafood into Australia. In this submission, SIA has addressed Information Requests 1 and 2 and has provided a number of additional comments.

About SIA

SIA is the national peak-body representing the Australian seafood industry as a whole. With members from the wildcatch, aquaculture and post-harvest sector, including state, territory and sectorial associations, along with seafood businesses and producers. We are the voice of Australian seafood.

Currently valued at more than \$3.15 billion [+3.5b in 2021/22 and forecast to rise to 3.63 in 2023/24] and directly supporting more than 17,000 Australian families ([ABARES, 2021](#)) and thousands more downstream in logistics and sales, the Australian seafood industry plays a key role securing Australia's food base, creating and maintaining jobs, boosting economic activity, and generating valuable export income for Australia and our rural and regional communities. Australian seafood accounts for 10 per cent of the national agricultural production.

Growth of our industry delivers increased jobs and investment in rural and remote Australia, and puts more than 1.5 billion meals of quality, healthy, sustainable seafood for Australian families and our international neighbours.

SIA provides consumers, Government and other stakeholders with confident and united representation.

Our mission is to Promote, Protect and Develop the Australian seafood industry on the national and international level. Our unity indicates that we love what we do, we stand by our products, and that our products are the best in the world.

Our Pledge

We are the Australian seafood industry, and we are committed to putting the best Australian seafood on your table now and for generations to come.

To ensure we do this in ways we are all proud of, we promise to:

- Actively care for Australia's oceans and environment and work with others to do the same;
- Value our people, look after them and keep them safe;
- Respect the seafood we harvest and the wildlife we interact with;
- Be transparent and accountable for our actions;
- Engage with the community and listen to their concerns; and,
- Continually improve our practices.

This is our pledge to you.

Overview

There are currently no reliable data on the level of IUU seafood products being imported into Australia. However, based on limited available information, SIA believes that any volume is likely to be low. SIA bases this assumption from examining import statistics for 2021-22 published by ABARES:

Table 1: ABARES import statistics 2021-22

25 Volume of fisheries products imports, Australia		
Commodity	unit	2021–22
Fish		
Live fish	kt	Na
Tuna	kt	42.022
Salmonids	kt	12.019
Hake	kt	4.72
Swordfish	kt	0.107
Toothfish	kt	0.317
Herrings	kt	8.213
Shark	kt	0.702
Other fish	kt	88.864
Total fish	kt	156.965
Crustaceans and molluscs		
Prawns	kt	34.243
Lobster	kt	0.756
Crabs	kt	1.82
Mussels	kt	2.783
Scallops	kt	2.154
Squid and octopus	kt	22.128
Other crustaceans and molluscs	kt	6.085
Total crustaceans and molluscs	kt	68.833
Other edible	kt	0.008
Total edible fisheries products	kt	225.806

In considering these figures, SIA does not see any indication that IUU seafood is likely to be entering Australia in significant levels as:

- the largest import volume is of ‘other fish’ and assumes that a significant proportion of this is farmed basa, in line with the Department’s statement that *“In Australia, frozen and thawed basa (catfish) fillets from farms in Vietnam are now the most commonly and widely eaten import.”*
- the second largest import volume is tuna, some – but not all – of which will be subject to a tuna catch documentation scheme, RFMO arrangements or other traceability scheme; and
- the third largest import volume is prawns which are also likely to be from aquaculture operations.

These three categories account for over 70% of Australia seafood imports for 2021-22.

SIA notes that a combination of existing and planned measures around the world are likely to have a cumulative impact on overall global levels of IUU fishing and trade in years to come. These include the recent ratification of the WTO Fishing Subsidies Agreement, existing Catch Documentation Schemes and traceability initiatives, particularly the Tuna Traceability Commitment.

SIA also believes that Australia's oversight, monitoring and enforcement of the application of Australian Harmonised Export Commodity Classification (AHECC) codes has been robust, particularly compared to other countries and that Australia's import regulations are internationally regarded to be strict.

SIA also considers that Australia has performed a leadership role in adopting and advocating for multi-lateral traceability schemes and trade agreements, providing support to regional partners and adopting Country of Origin labelling for retail seafood.

Therefore, until more data are available that indicate that Australia is importing IUU seafood products, SIA recommends maintaining and building upon arrangements already in place and not to develop any policy reforms unless there is a compelling case for doing so.

SIA understands that MRAG Asia Pacific will be providing a report on estimates of IUU seafood products entering Australia and welcomes this development. SIA recommends that the Department carefully consider MRAG's report before considering changes to current arrangements.

Information request 1

To what extent do Australia's seafood imports contribute to global IUU fishing and how are we affected by this activity?

Currently, there are no reliable data on the level of IUU seafood products being imported into Australia. However, as described above, SIA believes that the volume is likely to be low and any impacts upon the Australian seafood industry are likely to be correspondingly low.

What practices are already implemented by governments, non-profit organisations and industry (including importers, wholesalers and retailers) to reduce the risks of IUU fishing products from entering Australia?

Arrangements and programs already in place include, amongst others:

- the Port State Measures Agreement;
- the recent ratification of the WTO Fishing Subsidies Agreement;
- Australian Harmonized Export Commodity Classification (AHECC) codes
- existing Catch Documentation Schemes and/or other RFMO monitoring, control and surveillance measures;
- traceability initiatives, particularly the Tuna Traceability Commitment;
- Marine Stewardship certification for an increasing number of fisheries; and
- novel and emerging solutions such as [CSIRO's program](#) to conduct genotyping to identify tuna by species and provenance.

Are you aware of any evidence that Australian imports of certain species or seafood product from specific countries, regions or fisheries pose a higher risk of being derived from IUU fishing practices?

See above. If any such risks exist, it seems more likely that they would be associated with imports of tuna species not covered by RFMO monitoring, control and surveillance measures, and/or a catch documentation or other traceability scheme. However, SIA has no evidence to suggest that this is occurring.

What data and methodological approaches should we consider when assessing the key sources, and the value and volume of any IUU fishing product entering Australia?

- Analysis of Trade and Customs import data to identify patterns and trends in seafood trade;
- Where possible, comparison of import data vs country of origin export data and/or FAO import and export data to identify gaps;
- Collaborative information sharing with international agencies such as RFMOs, Interpol Global Fisheries Unit and other partner countries;
- Supply chain intel gathering and risk profiling to identify possible laundering of IUU seafood products;
- Where feasible, conduct DNA testing on products entering Australia.

More timely publication of ABARES statistics would also be useful

Information request 2

Have market-based measures to combat IUU fishing applied in the European Union, United States or Japan, or by multilateral fishery bodies, been effective in curbing IUU fishing?

SIA has no information to evaluate the efficacy of the EU, USA or Japan market-based measures. However, we note that the three key actions in the more recent Japanese legislation are actions that Australia is, to some extent, already doing. For example, selecting species to be covered based on fair and clear standards; reducing the workload of operators and enhancing traceability through electronification; and pushing international collaboration forward.

SIA also notes that a USA program such as the Atlantic Highly Migratory Species International Trade Program would be an expensive and resource intensive option for Australia for what is likely to be a relatively low volume of imports of species not already falling under existing arrangements.

To what extent do evaluations of existing import controls schemes translate to an Australian context? Do Australia's market characteristics pose additional challenges/risks?

SIA believes that Australia's market characteristics pose lesser risk of importing IUU seafood products due to our existing strong import controls, our physical border as a result of our island status and our relatively small market that favours lower value seafood products.

What is the relationship between non-market and market-based policy options to combat IUU fishing? In an Australian context, should market-based measures be prioritised over other approaches, such as providing support to developing states to implement international agreements or to enhance their monitoring, control and surveillance capabilities?

SIA does not believe that market-based measures should be prioritised over other approaches such as providing support to our overseas partners to implement international agreements or develop their monitoring, control and surveillance capabilities. As mentioned elsewhere in this submission, SIA believes Australia should give existing arrangements time to become effective and to continue to work to enhance their efficacy.

Is there a compelling case for Australia to implement unilateral market measures or are multilateral approaches preferred? What are the trade-offs between these approaches?

SIA is not in favour of Australia adopting unilateral market measures as:

- a) this could place Australia at risk of being drawn into a WTO dispute;
- b) the potential risk of retaliatory measures by larger markets on Australia seafood exports is likely to be greater than the potential benefits; and
- c) the relatively low volume of Australia's seafood imports means that any such measures would be unlikely to have a significant impact on overall levels of IUU fishing.

SIA believes that Australia has been a strong advocate and participant of multilateral schemes. The efficacy of these schemes is likely to take several years to be realised whilst they are further developed and refined. SIA therefore believes Australia should give these schemes time to fully realise their potential before considering implementing new measures.

Thank you

SIA thanks the Department for providing the opportunity to comment and asks the issues raised in this submission to be considered.

I welcome the opportunity to discuss any of our requests with you further and can provide more details if needed.

Finally, I would like to thank you in advance for your support of the future of Australia's seafood industry.

Yours sincerely,

[Redacted signature]

CEO, Seafood Industry Australia Ltd

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