

20th November 2009

Emailed: FoodLabellingReview@health.gov.au

Food Labelling Review Secretariat
Department of Health and Ageing
MDP 150
GPO Box 9848
Canberra ACT 2601

Dear Sir/Madam

Northern Territory Seafood Council Submission to the Food Labelling Law and Policy Review.

The Northern Territory Seafood Council (NTSC) is the peak representative body of the seafood industry in the Northern Territory, representing all wild catch fisheries and aquaculture operations.

The NTSC 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 NTSC 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.

The Australian Fish Names Standard (section 4) requires the Standard Fish Name to be used when fish are sold or traded to consumers (e.g., retail sales and restaurants). Fish sold or traded other than directly to consumers (eg, wholesale, export, import) must be identified by their Standard Fish Name or scientific name. This mandatory labelling of fish names is essential to ensure the consumer is both informed about their seafood choices and most importantly that they can be confident they get the fish they have paid for.

Since June 2006 it has been a legal requirement that fresh 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 only binding on retailers of "unprocessed" seafood, which represents less than a third of the total seafood sold in Australia. The majority of seafood is sold in venues selling "processed" seafood for

immediate consumption including restaurants, clubs, bars, and even fish and chip shops are exempt from this labelling requirement.

The Northern Territory Government introduced regulations in Nov 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.

The NTSC will be undertaking an 18 month project commencing in early 2010 to monitor the impact of these new regulations and to identify any impacts of the labelling requirements on consumer choice. However, the immediate and overwhelming public support from the consumer has already demonstrated the need for mandatory CoOL for seafood through the entire supply chain.

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.

Over 70% of the seafood consumed in Australia is imported.

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 NTSC 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.

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 would seek the opportunity to provide a more detailed and evidenced based submission to the review when the opportunity arises.

A copy of the NTSC policy on seafood labelling is enclosed for information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rob Fish', with a long horizontal flourish extending to the right.

Rob Fish
Chairman