

Senate Inquiry into *Biosecurity Act 2012*.

Submission by the Western Australian Fishing Industry Council Inc. (WAFIC)
April 2013

WAFIC is the peak industry body for the fishing and seafood industries in Western Australia. It encompasses the harvest sector (including wild harvest (fishing and pearling) and aquaculture. The Industry Council has represented the industry since its establishment in 1968 and is unique in representing the whole of the industry in the State.

Individual sector representative bodies are members of WAFIC, but may make their own submissions to the plan. This has been with the full support and encouragement of WAFIC as the sectors and even individual companies can give levels of detail concerning them that this overarching submission may not be able to do.

Fisheries are a community resource because oceans beyond the high-water mark are vested in the crown and harvested only by licence. The public good component of fisheries relates to the community and conservation benefits from sustainable fisheries, the amenity value from recreational fishing and the health benefit that the Australian community derives from the consumption of its seafood.

WAFIC has concentrated its submission into three areas where decisive action by the Federal Government would do the most to achieve the objectives of the Biosecurity Act in relation to the supply of seafood:

1. Standard Names for fish:
2. Country of Origin:
3. Endogenous disease risk assessments.

Truth in Labelling: WAFIC submits that the Australian consumer will never have full confidence in the industry unless Food Standards Australia New Zealand mandates Standard Names for fish and seafood and requires that seafood is labelled with its country of origin wherever it is sold.

1. Standard Names for fish.

The crux of this submission is that, without enforceable standard labelling, seafood imported to Australia could carry an unacceptable level of risk and still enter the country. If a known disease is prevalent in, for example, a species of prawn then it is simply too easy for an exporter to change the name on the carton to a disease-free species so that it escapes proper scrutiny. When FSANZ refused to include Standard names for seafood in the Food Standards Code, it meant that Biosecurity Australia (AQIS Imports) also declined to check that what was in the box was actually the same as what was written on the box, allowing a grey trade in dodgy seafood to flourish. It

also means that, if a disease outbreak or food safety incident occurs it would be impossible to trace the actual source of the problem.

This has created significant uncertainty and insecurity for suppliers of seafood, which would be greatly alleviated by a simple change to a regulation.

2. Country of Origin to be used wherever fish is sold to the public.

The Australian public has shown time and again that it is suspicious of substitution and demands truth in labelling. FSANZ ducked this issue when it required country of origin to be clearly labelled for unpackaged seafood sold to the public at retail, but failed to extend that to the food service sector. Evidence from the Northern Territory has demonstrated that the public appreciates being fully informed and that, as with Standard names, in the event of a food safety issue, proper labelling will facilitate product recall and prevent Australian suppliers from being disadvantaged where there is a general recall of a particular species.

Both points 1 & 2 can be addressed by two simple changes to the Food Standards Code and would allay these suspicions completely. The Federal Government should require Food Standards Australia New Zealand to commit to its promise of 2003 to mandate the Standard names for fish and seafood in Australia and that the Country of Origin of seafood should be displayed wherever fish is sold to the public.

3. Endogenous disease risk assessments.

(Reduction of 'green-tape' on fisheries and aquaculture development.)

WAFIC submits that the Federal Government, if it genuinely wishes to secure the supply of Australian Seafood must remove the barriers to production and growth. The 'appropriate level of protection' (ALOP) has been seen to be used as a barrier to development. This is particularly so where government officials, not versed in proper evaluation of risk – including social and economic risk, use the simplistic definition of Acceptable Level of Risk to mean the virtual absence of risk. The risk should be that which society will accept if it wishes to enjoy the benefit wrought from the activity. For example, canned seafood always carries a high risk of Botulism. This is because, while the likelihood is extremely low, the consequence is dire (Botulism kills people). This does not halt the canning of seafood. The Australian public understands that the management measures put in place attenuate the risk to the point where, though it must always remain high, it is acceptable. Ecological risk assessments, even where they are carried out to the Australian Standard, frequently ignore economic and social risk, so the conditions placed on development become so onerous that none takes place. The economic risk to a successful enterprise is simply too great.

WAFIC submits that industry should have genuine input into risk assessments by Government Departments and the risk assessments should be open, transparent and accountable with assessment panels drawn from industry as well as government and academics.

The above are not exhaustive, but if the long decline in the value of Australia's fisheries production (below) is to be reversed then the country cannot continue with the levels of uncertainty that stifle development and growth.

Simply, there are far too many impediments placed in the way of seafood enterprises in Australia – three of them are listed above and the uncomplicated no-cost measures proposed will go some way to restoring the industry's confidence that Government is not working against its and the public's, interests.

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Fig 2: Gross Value of Production of Australian fisheries 1996-2010 (ABARES)

