MENDING THE NET

Strengthening Australia's import policies to combat illegal seafood

MINDEROO FOUNDATION

ACKNOWLEDGEMENTS

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Minderoo Foundation

Minderoo Foundation is a modern philanthropic organisation. We take on tough, persistent issues with the potential to drive massive change. We incubate ideas and accelerate impact. We push the limits of what is believed possible. Minderoo Foundation is independent, forward thinking and seeks effective, scalable solutions. We are proudly Australian, and one of Asia's largest philanthropies, with AU$2 billion committed to a range of global initiatives. Flourishing Oceans is a Minderoo Foundation initiative that aims to restore the health of our ocean by combatting overfishing, increasing marine protection, and expanding our understanding of the marine environment.

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Cover Image: Fishing vessel in Vietnam.
Photo credit: Khanh Bui via Getty Images.

EXECUTIVE SUMMARY

Fresh seafood in packaging – no label..
Photo credit: Peerasit Chookmaneenuch
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Knowing where our seafood comes from – every step of the way, from catch to plate – is critical to ensuring that products are, at the very minimum, legal and sustainable. Today, it is impossible to provide this assurance to Australian consumers.

The average person eats approximately 14 kilograms each year.[1] To meet this appetite, we rely on imported seafood - with approximately 65 per cent of the seafood we eat coming from abroad. Many of these source countries have lower standards for fishing practices than Australia, with poor track records on illegal fishing and modern slavery on fishing vessels and in seafood processing plants.

Australians are increasingly aware of the need to protect our ocean from unsustainable fishing and want better information about the seafood on offer, so they can be confident the seafood they buy is sustainable. Roughly 75 per cent of Australian seafood consumers also believe that supermarkets and restaurants should remove unsustainable fish from their shelves and menus.[2]
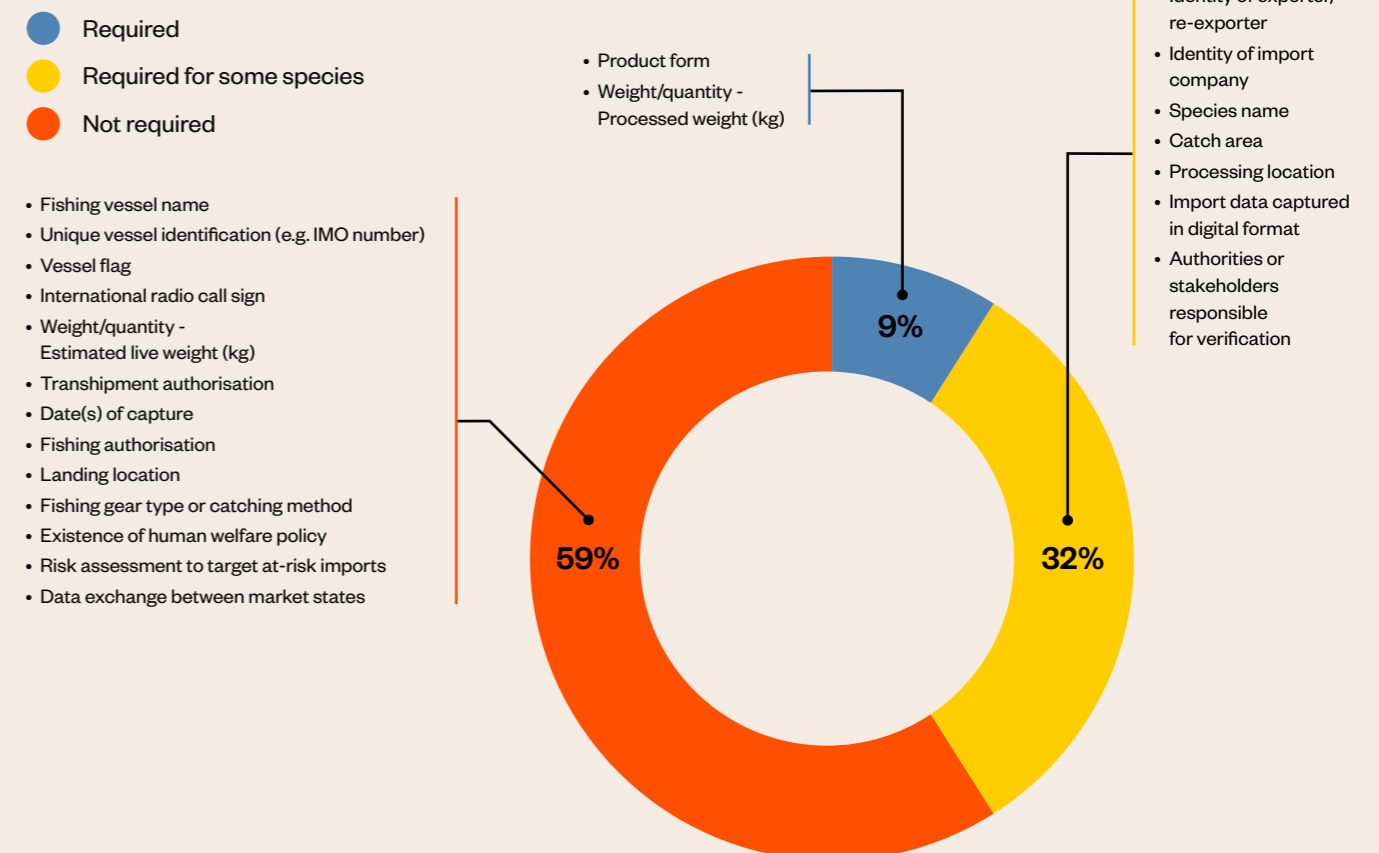
In this report, we review Australia's policies on seafood imports and labelling, including what information the government requires importers to report and whether this is sufficient to allow products to be traced through global supply chains and stop the importation of illegal, unsustainable or exploitative products.

Very little information is captured at our borders about seafood products (Figure 1) – making it impossible to demonstrate that imported products are legally, sustainably or responsibly produced. Further, once seafood makes its way to supermarket shelves or restaurant menus, consumers lack access to basic information on what they are eating, where it's from or how it was caught.

The Australian government must urgently "mend the net" on its seafood import policies to ensure that the seafood we eat in Australia is legal, sustainable and free from forced labour. To do this, Australia must adopt stronger controls that require a product to demonstrate its legality prior to import and establish a verified traceability and labelling scheme that covers all aspects of the supply chain, from catch to plate.

Figure 1

Reporting status of key data elements (KDEs) in Australia, where KDEs are the pieces of information Australia needs to collect from seafood importers to prevent illegal seafood from entering the country. KDE categories include: **Not required**, meaning that importers are not required to provide any information on the KDE to the government, **Required for some species**, meaning that imported are only required to provide this information for some species and/or products – such as salmon, and **Required**, indicating that importers must provide information on the KDE to the government. Of the 22 KDEs, Australia only requires information on two from importers: a product form (e.g., fresh, frozen) and product weight. In contrast, Australia does not require information on 20 KDEs, including fishing gear type or catching method, existence of human welfare policy and date of capture.

🔵 Required
🟡 Required for some species
🔴 Not required

• Product form
• Weight/quantity - Processed weight (kg)

• Fishing vessel name
• Unique vessel identification (e.g. IMO number)
• Vessel flag
• International radio call sign
• Weight/quantity - Estimated live weight (kg)
• Transhipment authorisation
• Date(s) of capture
• Fishing authorisation
• Landing location
• Fishing gear type or catching method
• Existence of human welfare policy
• Risk assessment to target at-risk imports
• Data exchange between market states

• Identity of exporter/ re-exporter
• Identity of import company
• Species name
• Catch area
• Processing location
• Import data captured in digital format
• Authorities or stakeholders responsible for verification

9%

32%

59%

KEY INSIGHTS FROM OUR REPORT

RECOMMENDATIONS

1

Australia consistently collects only 2 of 22 pieces of information needed to provide catch-to-plate traceability.

Key data gaps relate to *who* caught the seafood (e.g. the vessel that caught the catch), *when* it was caught, *what* fishing gear was used, *whether* the vessel was authorised to fish in that area, and *where* the seafood was initially landed. There is also no independent verification of any reported information. As such, the current system is unable to ensure step-by-step traceability or confirm the legality of imported seafood.

2

Australia lacks a targeted seafood import policy to ensure legality.

It relies on a patchwork of legislation focused on food safety and biosecurity. Without targeted national seafood import regualtions, as is found in some major importing regions such as the European Union and the United States, the legality and origin of much of the seafood imported in Australia remains unknown.

3

Australia's seafood labelling system is inadequate.

Outside of the Northern Territory, seafood sold in restaurants and cafés is exempt from country of origin labelling. When dining out, consumers lack access to basic information about seafood products: what species it is, where it comes from and whether it was farmed or wild-caught. A national, standardised approach to labelling at all points of sale is critical for enabling consumers to make informed decisions about the seafood they eat.

We recommend that the Australian government urgently implement a comprehensive seafood import control system, which includes a catch documentation scheme, requires proof of legality at the point of entry, and establishes national seafood labelling standards.

These types of comprehensive import control systems have already been established in key seafood markets like the European Union and the United States. Given Australia's regional market influence, improving our standards for seafood imports offers an opportunity to show leadership, create change across our seafood supplier network and demand accountability across the global supply chain to eliminate illegal fishing. Australia must establish:

A comprehensive catch documentation scheme.

1

Imports must be accompanied by clear documentation that allows the product to be traced through every step from point-of-catch to point-of-sale. A formal verification process is also needed, to ensure reported information is legitimate.

Australia must collect data on:

- **Product type** – species and live weight
- **Who** caught the seafood and is trading it – fishing vessel name, unique vessel identifier, vessel flag, and importer and exporter details
- **When** it was caught – the date on which catch occurred
- **Where** it was caught – country code, Regional Fisheries Management Organisation (RFMO) area, and/or Food and Agriculture Organization of the United Nations (FAO) fishing area
- **Evidence** the vessel was authorised to fish and/or tranship in that area
- **How** the product was caught – the fishing methods and gear used and compliance with the source country's regulations
- **Landing** and processing location(s)

Strict regulations that require importers to demonstrate a product's legality prior to border clearance.

2

Illegal seafood should not be allowed into Australia. New regulations are needed that require importers to demonstrate that the seafood has been caught and produced in compliance with the supplier country's laws. This system must be backed by strong monitoring and enforcement mechanisms.

Consistent national seafood labelling standards.

3

Australian consumers should be provided with accurate information on the seafood product's species, country of origin, and method of catch/production, at all points of sale – building on what exists currently in the Northern Territory.

INTRODUCTION

Traceability is critical for tracking products through global supply chains and allows us to answer where our products come from and how they got to us. Traceability can help protect consumers from unregulated or undesirable products, but it also empowers consumers, allowing them to confidently choose products based on accurate information.

Today, traceability is a legal requirement for many of the products we consume – baby food, milk, eggs and many other goods are labelled with country of origin, ingredients, and unique codes that allow product recall or rejection.[3]

Outside of food safety requirements, the global seafood industry has largely been left behind by this revolution in traceability. Given that seafood is one of the most highly-traded foods globally,[4] this lack of traceability is no longer acceptable.

Seafood supply chains are notoriously complex, typically spanning multiple countries and languages. Products are often mixed with fish from other sources, with poor documentation of how, when and where products were caught, processed or packaged. This lack of information increases the risk of product substitution, mislabelling and other types of seafood fraud.[5] One analysis found evidence of mislabelling in roughly 40 per cent of seafood sold in restaurants, fishmongers and supermarkets in 30 countries, including Australia – with endangered and protected species marketed as legal, lower-quality species as higher-quality ones and, in some cases, pork as prawn.[6]

••
Fishing vessels catching skrei cod in the Arctic sea.
Photo credit: Getty Images.

Traceability plays a key role in combatting illegal, unregulated, and unreported (IUU) fishing. IUU fishing relates to all stages of seafood production - including catch, processing and shipping, and takes many forms.

IUU fishing includes fishing illegally - for example, using illegal methods or practices or without permission of the local authorities. It can also refer to activities that are not reported, or misreported, ('unreported' fishing) or that lack explicit government regulation ('unregulated' fishing).[7] IUU fishing accounts for one-in-five fish caught every year,[8] resulting in annual global losses of US$26 billion to US$50 billion, with losses in tax revenue alone of up to US$4 billion.[9] Illegal fishing, in particular, maximises catch and profits with no consideration of long-term sustainability and is one of the main drivers of overfishing globally.[9] Beyond environmental concerns, illegal fishing typically goes hand-in-hand with exploitative labour practices, such as forced labour and human trafficking.[10]

Illegally caught seafood enters global markets through unconventional and clandestine means, such as offshore transhipment – where catches are moved between vessels at sea –poorly-regulated ports, and intermixing with legal products at later stages in the supply chain.[10] Policies that require traceability and other supply chain information are critical for keeping these products out of the market and deterring illegal fishing by making it impossible to sell, at a profit.

Traceability is also vital for empowering consumers to make sustainable purchasing decisions – something on the minds of many Australians. According to a recent survey by the Marine Stewardship Council, nearly 9 in 10 Australian seafood consumers say they want better information, so that they can be confident they are not buying unsustainable seafood. Roughly 75 per cent also believe that supermarkets and restaurants should remove unsustainable fish from their shelves and menus.[2] Meeting these expectations, however, is challenging: 65 per cent of our seafood – valued at over AU$2 billion annually – is imported, from over 90 different countries.[11] Just three countries – Thailand, China and Vietnam, all of which have documented instances of poor fisheries governance and labour practices – account for over half of these imports by value. [12][13]

Australia has shown strong leadership to combat illegal fishing within its own waters and across the region. This includes adopting measures to prevent, deter and detect illegal fishing within Australian waters – and preventing illegal operators from landing catches at Australian ports.

In this report, we review Australia's policies on seafood importation, traceability, and labelling. We use global standards for seafood traceability to assess how Australia is performing and identify major policy gaps that may be allowing illegal and unsustainable seafood into the country. Finally, we provide evidence-based recommendations to the Australian government on how to stop these products from "slipping through the net" into the Australian market — and onto consumer plates.

OUR APPROACH

This report reviews Australia's policies on seafood importation, traceability and labelling in order to assess Australia's ability to stop the importation of illegal, unsustainable and exploitative seafood products into our markets.

First, we assess the traceability of Australia's imported seafood. Successfully tracing a product throughout a supply chain requires capturing certain information – referred to as 'key data elements' (KDEs) – every step of the way, including catch, transhipment, landing, processing and importation. KDEs comprise the minimum information that needs to be documented and shared across the seafood supply chain to verify the legality of a product.

In this report, we compare the information currently captured by the Australian government against 22 KDEs recognised as fundamental for establishing baseline traceability of seafood products. These KDEs have been recognised by the Global Dialogue on Seafood Traceability (GDST) Standards and Guidelines for Interoperable Seafood Traceability Systems (v1.0) and a recent collaborative report by the Environmental Justice Foundation, Oceana, The Nature Conservancy, The Pew Charitable Trust, and WWF.[14]

The assessed KDEs include data points such as fishing vessel name, authorisation to fish, importer identity, species name, and the existence of a human welfare policy on the vessel.[15] See the **Appendix** for a list of the 22 KDEs assessed and their definitions.

We next examine Australia's current legislation on seafood importation and labelling, with the aim of identifying policy gaps that are allowing illegal seafood into the country, and limiting the ability of consumers to make informed purchasing choices. We focus on wild-caught, imported seafood, including products caught, processed, and/or packaged outside of Australia prior to entering the Australian market. This includes seafood that is caught in Australian waters, exported overseas for processing, and re-imported. For a detailed description of how we define illegal fishing, see the **Glossary**.

Finally, we explore seafood import policies in the European Union and the United States and provide recommendations for how the Australian government can improve Australia's seafood import control system, in line with these global leaders.

Seafood for sale in market. Photo credit: Martina Lanotte / EyeEm via Getty Images.

OUR INSIGHTS

INSIGHT 1

Traceability of imported seafood products in Australia is incredibly limited

Australia's current import requirements are fully consistent with only two of the 22 KDEs needed for a robust import control program to combat illegal fishing (Figure 1; Table 1). Over half of KDEs (59 per cent) are not captured for seafood imports into Australia, while 32 per cent are captured for only some species or products.

Currently, the Australian government does not consistently capture the following critical information from seafood importers:

- Who caught the seafood (fishing vessel name, unique vessel number, vessel sign, international radio call sign)
- Location of catch (country of origin)
- When it was caught (date of catch)
- The product's legality, i.e. the fishing vessel's authorisation to fish in waters where catch occurred and/or to engage in at-sea transhipment, if applicable
- The type of fishing gear used or existence of a human welfare policy
- The location where the seafood was first landed

This poor information means that Australia currently lacks a comprehensive and targeted means of tracking seafood products from source-to-market and ensuring their legality. Also absent is a formal process by which to independently verify reported information.

In the two cases where Australia consistently meets the KDEs – product type (i.e. fresh, frozen, fillet) and processed weight – this information is captured for biosecurity (e.g. prawns, salmonids) and/or customs reporting.

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Drone image of seascape.
Photo credit: Nora Carol via Getty Images.

Of the 22 key data elements, only two (9%) are identified to prevent the importation of illegal seafood entering into Australia.

Figure 1

Reporting status of key data elements (KDEs) in Australia, where KDEs are the pieces of information Australia needs to collect from seafood importers to prevent illegal seafood from entering the country. KDE categories include: **Not required**, meaning that importers are not required to provide any information on the KDE to the government, **Required for some species**, meaning that imported are only required to provide this information for some species and/or products – such as salmon, and **Required**, indicating that importers must provide information on the KDE to the government. Of the 22 KDEs, Australia only requires information on two from importers: a product form (e.g., fresh, frozen) and product weight. In contrast, Australia does not require information on 20 KDEs, including fishing gear type or catching method, existence of human welfare policy and date of capture.

- Fishing vessel name
- Unique vessel identification (e.g. IMO number)
- Vessel flag
- International radio call sign
- Weight/quantity - Estimated live weight (kg)
- Transhipment authorisation
- Date(s) of capture
- Fishing authorisation
- Landing location
- Fishing gear type or catching method
- Existence of human welfare policy
- Risk assessment to target at-risk imports
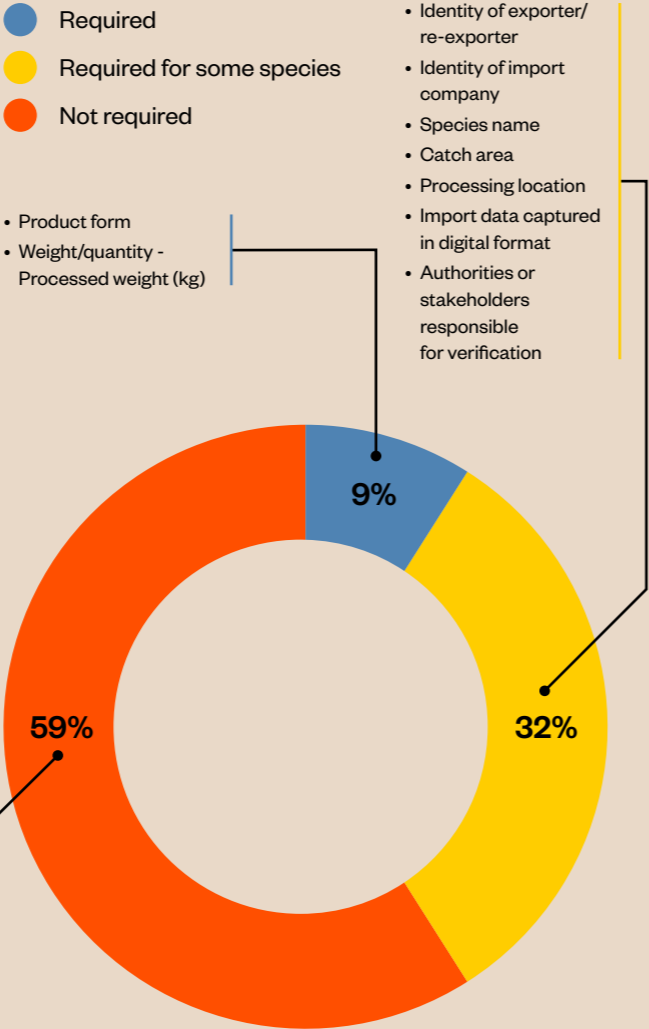- Data exchange between market states

Legend:
- Required (blue)
- Required for some species (yellow)
- Not required (orange)

- Product form
- Weight/quantity - Processed weight (kg)

- Identity of exporter/ re-exporter
- Identity of import company
- Species name
- Catch area
- Processing location
- Import data captured in digital format
- Authorities or stakeholders responsible for verification

Donut chart: 9%, 32%, 59%

Table 1

Reporting status of 22 key data elements (KDEs) under Australia's current seafood import regulations.[16] Reporting status is categorised as orange (not required), yellow (required for some species) OR blue (required). KDEs are categorised based on: (1) "Who" – the fishing vessel or processor in the source country, (2) "What" – type and quantity of seafood, (3) "When" – date of catch, (4) "Where" – country or location of origin, (5) "How" – methods of fishing, including human welfare policies, and (6) Other criteria.

Key Data Element (KDE)	Status	Does Australia capture this information?
WHO: Fishing vessel or processor in source country		
Fishing vessel name	orange	**No** – the Import Declaration prescribed under the Australian Customs Act (Import Declaration) requires the vessel name and identification for the vessel importing the seafood (e.g. cargo ships), not the catch vessel.
Unique vessel identification (e.g. IMO number)	orange	**No** – the Import Declaration requires vessel name and identification for the vessel importing the seafood (e.g. cargo ships), not the catch vessel.
Vessel flag	orange	**No** – not required for imported seafood.
International radio call sign	orange	**No** – not required for imported seafood.
Identity of exporter/ re-exporter	yellow	**Sometimes** – supplier name is required on the Import Declaration and identifies the party who supplies the goods to the importer (one-up, one-down reporting recording system;[16] which requires the identification of the immediate supplier(s) and immediate buyer(s)). However, current import regulations do not capture whether the product is being re-exported to Australia, i.e. originated in a different country to the export country, nor information for all points backward in the supply chain.
Identity of import company	yellow	**Sometimes** – importer name is required on the Import Declaration. However, regulations do not capture the identity of the import company where a product has been exported overseas for processing and then re-exported to Australia.

Key Data Element (KDE)	Status	Does Australia capture this information?
WHAT: Type and quantity of seafood		
Product form	blue	**Yes** – a general goods description is required on the Import Declaration. The Biosecurity Import Conditions (BICON) permit (under the Biosecurity Act 2015) requires descriptions of goods in more detail (e.g. fresh, frozen, head and gills removed) – on a species specific basis.
Species name	yellow	**Sometimes** – for biosecurity reasons, importers may be required to provide the species name, depending on the type of product.[18] Required for prawns and toothfish species, but not for other fish/fish products.
Weight/quantity - Estimated live weight (kg)	orange	**No.**
Weight/quantity - Processed weight (kg)	blue	**Yes** – gross weight of product required on the Import Declaration.
Transhipment authorisation	orange	**No.**
WHEN: Dates of fishing operation		
Date(s) of capture	orange	**No** – date of catch not required on the Import Declaration. Arrival date and date of valuation (date of export from place of export) is required. Date of departure from port of shipment is required for prawn imports.
WHERE: Location of catch		
Catch area (e.g. country code when fishing within a country's EEZ, relevant Regional Fisheries Management Organisation area, and/or FAO fishing area)	yellow	**Sometimes** – required for salmonid imports originating in countries approved for production. Catch area information is not required for other fish/fish products. Country of origin is required on the Import Declaration form for all imported products, but there is no certification or testing scheme for verifying statements. Note, country of origin may be listed as the place of last processing, not catch location. Certificates of origin and declarations of origin may be required to obtain preferential treatment under trade agreements,[18] and these may be subject to verification of origin.[a] Declarations of origin may also be required, even where preferential treatment is not sought. Canned fish (retorted goods) made from Australian or New Zealand sources require a manufacturer's declaration or New Zealand Minister for Primary Industries Certificate, which states that the goods originated from and were processed in Australia or New Zealand.
Fishing authorisation	orange	**No.**
Landing location	orange	**No.**
Processing location	yellow	**Sometimes** – required for salmonid imports to verify that processing occurred in approved country list. Required for prawns. Not required for other fish/seafood imports. Canned fish (retorted goods) made from Australian or New Zealand sources require a manufacturer's declaration or New Zealand Minister for Primary Industries Certificate, which states that the goods originated from and were processed in Australia or New Zealand.
HOW: Fishing methods		
Fishing gear type or catching method	orange	**No.**
Existence of human welfare policy	orange	**No.**
Other Criteria		
Import data captured in digital format	yellow	**Sometimes** – import data is generally captured through digital systems (e.g. Cargo Online System) but may also be submitted through paper forms.
Authorities or stakeholders responsible for verification	yellow	**Sometimes** – responsibility for verification varies depending on the type of information. For example, catch and processing facilities may need to be verified by the government of the country where catch or processing occurs. Country of origin may be verified by competent authorities in the jurisdiction of export. Generally, these additional verification requirements are only applied where preferential tariff treatment is sought, or where the species being imported is a high biosecurity risk.
Risk assessment to target at-risk imports	orange	**No.**
Data exchange between market states	orange	**No.**

a   e.g. Comprehensive and Progressive Agreement for Trans-Pacific Partnership art 3.27

SPOTLIGHT ON: TOOTHFISH

An exception to the results is toothfish – a highly sought-after species found in restaurants and high-end markets worldwide. In recent years, the toothfish (*Dissostichus spp.*) has become a target for IUU fishing vessels, such that licenses are now required to catch and trade toothfish.

The Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR) implements a range of measures to conserve and manage the species, with these measures seeking to minimise the impact fishing has on the sustainability of target species, on species taken as by-catch and on the marine ecosystems. CCAMLR also uses a range of fisheries monitoring and compliance tools to ensure compliance, including a Catch Documentation Scheme (CDS) for toothfish.

The CDS requires CCAMLR member countries, which includes Australia, to identify the origin of toothfish entering their markets, to determine if the toothfish was caught in the CCAMLR Convention Area, and to ensure that the toothfish was caught in a manner consistent with CCAMLR conservation measures.

The Uruguayan-flagged ocean trawler, Viarsa, is finally stopped on 27 August 2003, after a marathon 20-day chase through ice-strewn waters in the South Atlantic. Australian fisheries officers are in the smaller patrol boat - Southern Supporter, catching the vessel with support from South African Fisheries. 85 tonnes of the rare Patagonian toothfish were found. Photo credit: AFP / Stringer via Getty Images.

INSIGHT 2

Australia lacks a targeted seafood import scheme to ensure legality

Unlike the European Union and the United States, Australia lacks a targeted national seafood import scheme – relying on a patchwork of legislation focused on food safety and biosecurity to regulate entry. These controls specifically address species with elevated safety and biosecurity risks, including prawns and salmonids.[b] We explore Australia's import rules below in detail.

Customs Act 1901

All goods coming into Australia must be cleared at the border in accordance with the *Customs Act 1901*. Under the act, all importation of fish, including fresh, smoked, preserved and frozen products, requires a permit. Of note, a special permit is required to import toothfish (*Dissostichus spp.*), due to the harmful effects of the fishing gear (bottom trawling) in an area of conservation importance and high prevalence of illegal fishing in the region (see **spotlight**).[19]

Imported goods undergo audit checks to ensure that the import declarations accurately reflect the commercial documents and physical cargo. In addition, goods with a value over AU$1000 must be accompanied by an Import Declaration, which captures the product's country of origin and country of export.[20] However, there is no formal process to verify the information.

There have recently been calls for amendments to Australia's *Customs Act 1901* to prohibit the importation of goods produced in whole or part by forced labour.[21] Implementing this legislation, however, would still require improved traceability and transparency in the seafood supply chain.

b   This excludes fish caught on an Australian registered vessel operating in Australian waters.

Biosecurity Act 2015

All imported food must comply with Australia's biosecurity laws, which requires the granting of a permit before the goods arrive in Australia; if they are imported without a valid permit, they are re-exported or destroyed.[22] Different import requirements apply depending on product type. For example, some products may require supporting documentation, a specific manufacturing treatment, or just an import permit.[23c]

Salmonids, which include salmon, trout and other fish species, are subject to more rigorous biosecurity requirements than many other products: they must be an approved species, caught from a population with a documented surveillance program, and can only be sourced and processed by "approved" countries.[23]

Imported Food Control Act 1992

Under the *Imported Food Control Act 1992,* importers are responsible for ensuring that their products comply with the Australia and New Zealand Food Standards Code (the Code).[24] The Code outlines standards for food additives, safety and labelling, and applies to all food that is imported, sold, processed or handled for sale in Australia or New Zealand. The Code is implemented at Australia's international borders by the Australian Government Department of Agriculture.[16]

The Code classifies imported food as either 'risk food' or 'surveillance food'. Risk food refers to food identified by Food Standards Australia New Zealand (FSANZ) as being high risk of contamination, whereas surveillance food is a catch-all term for all other low-risk products. Risk food is subject to higher testing rates than surveillance food and includes seafood products such as clams, mussels, oysters and scallops.[25]

The Code requires that seafood products can be traced through the supply chain via a 'one-up, one-down' recording system,[16] that is – the identification of the immediate supplier(s) and immediate buyer(s). In theory, this provides a mechanism for investigating the movement of seafood products from source to market; however, there is no integrated reporting or tracking across the entire supply chain.

Free Trade Agreements

Australia currently has 15 Free Trade Agreements swith 26 countries that include commitments to reduce or eliminate tariffs for products that comply with Rules of Origin requirements.[18] If preferential treatment of seafood imports under a trade agreement is being sought, then a Certificate of Origin or Declaration of Origin, which captures information on the origin of the product may be required. However, it is important to note that the "country of origin" is not necessarily where the fish was caught but rather the country from where it was exported from, prior to arriving in Australia. This represents a significant policy gap in terms of ensuring traceability across the full seafood supply chain. In addition, the form and certification of such documents varies according to each trade agreement.[18] Consequently, these forms vary in reliability, depending on who is making the declaration (e.g. self declaration or declaration by a third party) and the quality of certification processes.

Modern Slavery Act 2018

The *Modern Slavery Act 2018* (the Act) entered into force on 1 January 2019.[26] Modern slavery is an umbrella term used to describe serious exploitation where a person can leave or refuse the situation, this includes forced labour, debt bondage, forced marriage, slavery and slavery-like practices and human trafficking.[26] Under the Act, large businesses and entities that operate in Australia, including seafood importers, are required to submit annual modern slavery statements.[26] These statements set out the reporting entity's actions to assess and address modern slavery risks in their global operations and supply chains, however, there are no reporting requirements at the point of import.

Australia's seafood labelling system is incomplete

Outside of the Northern Territory, Australian consumers lack access to basic information about seafood products when dining out in restaurants or cafés: what species it is, where it comes from and whether it was farmed or wild-caught. A national, standardised approach to labelling at all points of sale is critical to enabling consumers to make informed decisions about the seafood they eat.

Seafood labelling in Australia is currently regulated by two policies: Australia and New Zealand Food Standards Code ("the Code") and the Country of Origin Labelling Information Standard 2016 ("the Information Standard").[27] The Code has a wide range of regulations covering labelling (e.g. nutritional information), food composition, food handling, production and processing. Within Australia, The Code applies to all businesses involved in the sale or handling of goods and is enforced at a state and/or territory level.[3] Failure to comply may result in significant penalties.[28]

The Information Standard was introduced in July 2016 and requires that all food sold in Australia has clear country of origin information in order to help consumers make more informed choices about the food they buy. Food vendors are required to keep all relevant documentation to substantiate origin labelling, and failure to do so can result in penalties.[27] However, the legitimacy of this information is questionable, given the limited information collected when seafood products enter Australian ports.[3]

The Information Standard only applies to seafood sold in retail settings,[d] such as supermarkets, where consumers primarily rely on product labels for information. Alternatively, seafood sold for immediate consumption – such as in restaurants, cafes, or other food service businesses – is currently exempt from country of origin labelling requirements.[3]

The Northern Territory applies more detailed labelling standards than any other part of Australia. Since 2008, the Northern Territory has required fish retailers, restaurants and other dining venues to label imported seafood prepared for immediate consumption as "imported" - this includes the mandatory labelling of seafood by country of origin and the differentiation between wild-caught and farmed products for consumers.[29]

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c   Specific details of import conditions under the Biosecurity Act is available from the BICON website.14

d   Note: the Australia Government are currently evaluating reforms to Country of Origin Labelling for Food regulations and sought input from stakeholders and consumers in late-2020. This is the first stage of a wider consultation process that will include discussion papers, online surveys, consumer focus groups and industry and government collaboration.

SEAFOOD IMPORT CONTROL SYSTEMS: WHAT CAN WE LEARN FROM OTHER COUNTRIES?

The European Union and the United States – which respectively rank first and second globally in terms of the volume of seafood they import[14] – have targeted seafood traceability and import control regulation, backed by formal verification processes, to prevent IUU seafood products from entering their markets. Similar seafood import schemes are also being actively considered in Canada and Japan.[14]

•• *Fresh seafood for sale in the display case of a seafood store. Photo credit: Getty Images.*

European Union

In 2008, the EU introduced a catch certification scheme (CCS), via the EU Regulation to prevent, deter, and eliminate IUU fishing (EU IUU Regulation), which aims to prevent IUU seafood products from entering the EU market.[e] Under this regulation, all marine, wild-caught fish imported into the EU from non-EU countries (with some exemptions) must be accompanied by a catch certificate.

Under this certificate, fishing vessels operators in non-EU countries must provide the importer with documentation that shows that products were caught in compliance with national fishing laws. This information is validated by authorities in the country to which the vessel is "flagged" or registered. The exporting company also provides information on who processed the product and any other steps in the supply chain.

EU countries are required to verify that seafood products accompanied by a catch certificate are of legal origin, using a risk-based approach.[14] Under the EU IUU Regulation, non-EU countries identified as having inadequate measures in place to combat IUU fishing – either by foreign vessels in their waters or by their own vessels in foreign waters – may be issued with a formal warning, known as a 'yellow card'. In this instance, the EU restricts or blocks imports from these countries until corrective action is taken. Countries that fail to improve risk having their seafood banned from import into the EU through the issuance of a 'red card'. The carding system has proven to be highly effective, with the majority of yellow-carded countries implementing major reforms to address IUU fishing, and subsequently having their yellow cards removed.[30]

In 2019, the European Commission launched an EU-wide database for catch certificates, called CATCH, which allows members to monitor import documentation in real time and helps combat fraud.[31] While currently a voluntary system, legislation is expected to be adopted this year, thus making it compulsory for EU members.

United States of America

In 2016, the United States (US) introduced the Seafood Import Monitoring Program (SIMP), a permit-based system that requires catch documentation for 13 types of seafood identified as vulnerable to IUU fishing and/or seafood fraud. This includes abalone, Atlantic cod, all sharks, swordfish and tuna.[f]

Catch and landing documentation for these species is recorded through the International Trade Data System, the US government's single data portal for all import and export reporting. Importers are required to keep records regarding the chain of custody of the fish or fish product from catch to point of entry into US.[32] Unlike the EU system, the US' SIMP does not require information to be validated by flag, coastal, port or processing states – rather it is the importers' responsibility to validate all information. Audit findings are referred to the NOAA Fisheries Office of Law Enforcement for further action, as appropriate.[32]

A recent report by NOAA found that while the US framework captures information that supports the identification of illegal shipments through their random audit process, a routine examination would have a greater impact in addressing IUU fishing.[33]

The government is also currently considering expanding the SIMP framework to establish a more robust policy that includes all species.[34]

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e   Council Regulation (EC) No. 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (OJ L 286, 29. 10.2008).

f   The 13 species include abalone, Atlantic cod, blue crab (Atlantic), dolphinfish (Mahi Mahi), grouper, King crab (red), Pacific cod, red snapper, sea cucumber, sharks, shrimp, swordfish, and tuna (albacore, bigeye, skipjack, yellowfin, and bluefin).

CONCLUSION

Australia has taken action to combat illegal and unsustainable fishing within its waters and at ports, but there are significant gaps in Australia's current seafood import controls. These gaps risk the importation of illegal and unsustainable seafood in Australia and onto consumers' plates.

Australia has taken action to combat illegal and unsustainable fishing – through the adoption of a National Plan of Action[35] and a Regional Plan of Action to Combat IUU Fishing for SE Asia,[16 g] and by signing on to key international agreements, such as the FAO's Port State Measures (PSMA) and the FAO's *Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas 1993* (FAO Compliance Agreement).

These measures provide a strong system for preventing, deterring, and detecting illegal fishing within Australian waters – and preventing illegal operators from landing catches at Australia's ports.

However, our report demonstrates that Australia currently collects very little data on imported seafood and has few restrictions in place to prevent illegal products from crossing our border. This represents a significant gap in Australia's efforts to combat IUU fishing – and exposes retailers and consumers to illegal and unsustainable seafood. In order to effectively safeguard Australians from seafood produced using illegal, unsustainable and/or exploitative practices, the Australian government urgently needs to develop a targeted national program that provides 'catch-to-plate' traceability, ensures the legality of imported seafood and provides sufficient labelling to enable consumer choice.

Fisherman on a trawler empties a net full of fish into hold. Photo credit: Monty Rakusen via Getty Images.

g   RPOA-IUU parties: Australia, Brunei Darussalam, Cambodia, Indonesia, Malaysia, Papua New Guinea, the Philippines, Singapore, Thailand, Timor-Leste and Vietnam.

RECOMMENDATIONS

Given Australia's market influence, improving our standards for seafood imports offers an opportunity to show regional leadership, create change across our seafood supplier network and demand accountability across the global supply chain to eliminate illegal fishing. Failure to act not only undermines global efforts to combat IUU fishing, but jeopardises the Australian fishing industry, by providing an outlet for these cheaper, unsustainable products. Addressing the gaps in our seafood import controls is critical for protecting local fisheries and ensuring the health and sustainable management of our ocean into the future.

We recommend that the Australian government urgently implements:

1

A comprehensive catch documentation scheme.

Imports must be accompanied by clear documentation that allows the product to be traced through every step from point-of-catch to point-of-sale. A formal verification process is also needed, to ensure reported information is legitimate.

Australia must collect data on:

- **Product type** – species and live weight
- **Who** caught the seafood and is trading it – fishing vessel name, unique vessel identifier, vessel flag, and importer and exporter details
- **When** it was caught – the date on which catch occurred
- **Where** it was caught – country code, Regional Fisheries Management Organisation (RFMO) area, and/or Food and Agriculture Organization of the United Nations (FAO) fishing area
- **Evidence** the vessel was authorised to fish and/or tranship in that area
- **How** the product was caught – the fishing methods and gear used and compliance with the source country's regulations
- **Landing** and processing location(s)

2

Strict regulations that require importers to demonstrate a product's legality prior to border clearance.

Illegal seafood should not be allowed into Australia. New regulations are needed that require importers to demonstrate that the seafood has been caught and produced in compliance with the supplier country's laws. This system must be backed by strong monitoring and enforcement mechanisms.

3

Consistent national seafood labelling standards.

Australian consumers should be provided with accurate information on the seafood product's species, country of origin, and method of catch/production, at all points of sale – building on what exists currently in the Northern Territory.

APPENDIX

Key data elements (KDEs) assessed

The table below contains definitions for all KDEs included in the analysis, based on the Global Dialogue for Seafood Traceability Standards and Guidelines for Interoperable Seafood Traceability Systems (v1.0) and those identified in a joint report by Environmental Justice Foundation, Oceana, The Nature Conservancy, Pew and WWF on KDEs in import control schemes.[15][14]

WHO - Fishing vessel or processor in source country	
Fishing vessel name	Verbal moniker of a fishing vessel for identifying it visually and on vessel registries.
Unique vessel identification	Identifier associated with a vessel for the duration of its existence that cannot be re-used by any other vessel, with a permanent physical marking on the vessel.
Vessel flag	Nation with supervision over safety, fishing operations, and catch reporting.
International radio call sign	A unique alphanumeric identity that belongs to the vessel. It enables two vessels with the same vessel name to be identified separately.
Identity of exporter/re-exporter	Identification of the exporter/re-exporter (name, address and telephone number), whether from the initial landing or processing/packaging state.
Identity of import company	Identification of the importing company (the name, address and telephone number), whether that be in the destination country or a processing/packaging state.

WHAT - Type and quantity of seafood	
Product form	Reference to the degree of transformation of seafood from its original living form (e.g. frozen, fillet)
Species name	Scientific (Latin) name of the seafood
Weight/quantity - Estimated live weight (kg)	Numerically quantifiable amount of seafood with a standard Unit of Measure – based on live weight
Weight/quantity - Processed weight (kg)	Numerically quantifiable amount of seafood with a standard Unit of Measure – based on processed weight
Transhipment authorisation	Uunique number associated with a regulatory document, from the relevant authority, granting permission for discharge of wild-capture of seafood from a fishing vessel to a transhipment vessel.

WHEN - Dates of fishing operation	
Date(s) of capture	Calendar start and end dates when seafood was extracted for capture, irrespective of fishing vessel's voyage at sea

WHERE - Location of catch	
Catch area	Location where capture of seafood occurred, e.g. country codes when fishing within a country's EEZ, relevant Regional Fisheries Management Organisation [RFMO] area, and/or FAO fishing area
Fishing authorisation	Unique number associated with a regulatory document, from the relevant authority, granting permission for wild-capture of seafood by a fisher or fishing vessel
Landing location	Where seafood was first discharged to land.
Processing location	Name and address of the processing plant, approval number of the processing plant.

HOW - Fishing methods	
Fishing gear type or catching method	The equipment used to extract seafood from water for capture
Existence of human welfare policy	Indicator of human welfare policies in place on a vessel/trip, answering the question "What kind of human welfare, labor, or anti-slavery policy was in place on this vessel/trip?"

Other Criteria	
Import data captured in digital format	Digital record of import information to reduce risk of seafood fraud and streamline market controls.
Authorities or stakeholders responsible for verification	A framework that determines which authorities or industries should have the responsibility to make sure the data and information is legitimate.
Risk assessment to target at-risk imports	Development of a robust risk assessment protocol and/ or system to target at-risk imports, to ensure states are carrying out rigorous and stringent verifications on imports most at risk of being products of IUU fishing.
Data exchange between market states	Relevant data exchange between market States and RFMOs on "risky" imports, such as a central registry of import transactions.

GLOSSARY

Illegal, unregulated, and unreported (IUU) fishing

IUU fishing is a broad term used to describe fishing activities that "undermine efforts to conserve fish stocks in capture fisheries".[36] IUU fishing encompasses many activities, including illicit or unsustainable practices (such as, operating without authorisation, catching protected species, exceeding catch quota limits, using prohibited gear,[37] operating in contravention of transport and maritime law including fishing in the waters of another State without permission[10]), and worker safety and labour laws, both on fishing and transport vessels and in seafood processing and/or packaging factories.[38][39][10]

In this report, we define illegal fishing[h] as fishing activities:

- Conducted by national or foreign vessels in waters under the jurisdiction of a State, without the permission of the State, or in contravention of its laws and regulations, including those related to human and labour rights and worker safety;

- Conducted by vessels flying the flag of States that are parties to a relevant regional fisheries management organisation (RFMO) but operate in contravention of the conservation and management measures adopted by that organisation and by which the States are bound, or relevant provisions of the applicable international law; or

- In violation of national laws or international obligations, including those undertaken by cooperating States to a relevant regional fisheries management organisation, including those related to human and labour rights and worker safety[36]

Acronyms

AFMA	Australian Fisheries Management Authority	IUU	Illegal, unregulated, and unreported
BICON	Australian Biosecurity Import Conditions	EU IUU regulation	*Council Regulation (EC) No. 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing* (OJ L 286, 29.10.2008)
CCAMLR	Convention on the Conservation of Antarctic Marine Living Resources		
CCS	Catch Certification Scheme	KDE	Key data element
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	NPOA-IUU	National Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing
EU	European Union	PSMA	FAO *Agreement on Port States Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing*, also known as the Port State Measures Agreement
EEZ	Exclusive Economic Zone		
FAO	Food and agriculture Organisation of the United Nations		
FAO Compliance Agreement	*Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas*	RFMO	Regional fisheries management organisation
FSANZ	Food Standards Australia New Zealand	SIMP	US Seafood Import Monitoring Program
GDST	Global Dialogue on Seafood Traceability	The Act	*Modern Slavery Act 2018*
IFIS	Imported Food Inspection Scheme	The Code	Australia and New Zealand Food Standards Code
ICRS	International call radio sign	The Information Standard	Country of Origin Labelling Information Standard 2016
IMO	International Maritime Organisation		
IPOA-IUU	FAO *International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing*	UN	United Nations
		US	United States of America

h   Definition is based on the UN FAO's International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (IPOA-IUU) and has been amended to explicitly include human and worker rights, as established in international and national laws and regulations.

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