

# SEAFOOD INDUSTRY AUSTRALIA



**Australian Aquaculture Sector  
SIA Submission to the Standing  
Committee on Agriculture  
and Water Resources  
May 28, 2021**

**Seafood Industry Australia's Submission to the Standing Committee on Agriculture and Water  
Resources Inquiry into the Australian Aquaculture Sector.**

**Terms of Reference**

Inquiry into the Australian aquaculture sector terms of reference:  
to inquire and report on:

- a) the nature and current status of Australia's aquaculture sector;
- b) opportunities and barriers to the expansion of the aquaculture sector:
  - i) including ability to access capital and investment;
- c) opportunities to streamline and increase the effectiveness of the current regulatory frameworks that govern aquaculture activities in Australia; and
- d) the ability for businesses to access and commercialise new innovations to expand aquaculture.

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## **Introduction**

Seafood Industry Australia (SIA) welcomes the opportunity to make a submission to the House Standing Committee on Agriculture and Water Resources Inquiry into the Australian Aquaculture sector.

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

The Australian seafood industry directly supports more than 15,000 Australian jobs, and countless more downstream in transport, logistics, and processing. Australian seafood accounts for 10% of national agricultural production, and contributes \$3.5 billion in gross domestic product annually to the Australian economy.

SIA provides consumers, Government and other stakeholders with confident, balanced and united representation from across the industry.

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.

## **Note on the submission**

In response to the launch of the inquiry, SIA put a call out to all members, and the broader seafood industry, for information and feedback on the issues as outlined in the terms of reference of the inquiry. Due to SIA's position as the whole-of-industry national peak-body, the responses received from industry are varied. As such, we do not offer a singular position on all elements of the inquiry and instead put forward the most relevant, and consistent positions, from across industry.

SIA particularly thanks input into the submission from Australian Barramundi Farmers Association, Australian Southern Bluefin Tuna Industry Association, Northern Territory Seafood Council, Aquaculture Council of WA, the Fisheries Research and Development Corporation, and others.

As a result of this inquiry we have identified the following recommendations to be considered by the Australian Government to support the Australian aquaculture industry to achieve towards meeting the target of growing Australian agriculture to \$100 billion by 2030.

## SIA Key Recommendations

### ***Recommendation 1 – Social Licence***

Improving community's perception of the Australian aquaculture industry could be achieved through increased support for proactive and reactive community engagement strategies and awareness campaigns. Consider including questions around food production and provenance in the next National Census to reveal changes to the level of understanding and attitudes of the Australian public to food, including seafood. This could also be improved with changes to the ABS workforce codes.

### ***Recommendation 2 – Country of Origin Labelling***

Expand mandatory country of origin labelling legislation to include seafood sold in food service to provide transparency to Australian consumers, which will in turn improve domestic produce awareness, engagement and visibility, and thereby build positive community perception.

### ***Recommendation 3 - Improved market access – Domestic and Export***

Support SIA's submission to the Agriculture Trade Market Access Committee, along with continued partnerships with relevant Government bodies including Austrade and DFAT.

### ***Recommendation 4 – Department of Agriculture, Water and the Environment***

Establish a dedicated Aquaculture team within DAWE to elevate and manage the implementation of the National Aquaculture Strategy 2017. The team can work with SIA and industry to drive this strategy to achieve national aquaculture industry development goals.

### ***Recommendation 5 - Aquaculture zones and expansion into Commonwealth waters***

Support for a clear regulatory framework that allows aquaculture zone establishment and supports expansion into Commonwealth waters.

### ***Recommendation 6 - Biosecurity***

Recognise that aquatic diseases are the greatest threat to the Australian aquaculture industry. Border biosecurity is critical to protecting the growing aquaculture industry, commercial and recreational fisheries and the natural aquatic environment as there is little possibility to eradicate diseases that enter aquatic systems. Support an in-depth review and update to the 1999 IRA.

### ***Recommendation 7 - Investment in regional infrastructure***

Support further investment in regional infrastructure including roads and supply chain infrastructure e.g. cold chain, air freight, and support the adoption of innovative technology to reduce supply chain costs.

### ***Recommendation 8 - Regional workforce and skills shortages***

Support SIA's submission to the National Agricultural Labour Advisory Committee to establish a National Australian Seafood Careers Platform and improve the sectors access to labour.

### ***Recommendation 9 – Environmental Regulation***

Harmonise regulatory requirements, and improve the approval pathway for aquaculture development.

## **The nature and current status of Australia's aquaculture sector**

Aquaculture forms a critical element for the future of global seafood supply and protein-security, and is the fastest-growing food industry in the world, currently valued as a \$243.5 billion industry (O'Shae et al., 2019). In 2018, aquaculture provided 52% of all seafood for human consumption (FAO, 2020).

From an estimated global population of 7.7 billion people in 2019, the global population is tipped to grow to 10.9 billion in 2100 (United Nations, 2019). To feed these people food productions must double, which has problems related to limited resources and a changing climate. Seafood-based food strategies have the potential to substantially contribute to global food task and nutrition security (Hicks *et al.*, 2019). While the global protein consumption market could increase by up to A\$111 billion between 2018 and 2025, the market value of aquaculture is expected to grow at an annual rate of 12%, leading to a substantial rise of its share of the total protein market from 12% in 2018 to 21% in 2025 (FIAL, 2019).

Global seafood production is currently about 170 million metric tons, and by 2030 an additional 44 million metric tons will be needed to meet the demand for seafood (World Bank, 2013) of which a projected 109 million tonne of fish, providing 60% of the world's fish consumption, will come from aquaculture (FAO, 2018). Collectively, these statistics present a significant challenge for the agriculture and food sector and need to be met to avoid potential food security-based conflicts.

At present, the Australian aquaculture industry is valued at approximately \$1.57 billion (2020-21, Figure 1). The proportion of the value of Australian seafood production attributed to aquaculture has grown from 29% (2000/01) to 51% (2019/20) (Figure 3). Atlantic Salmon farming in Tasmania has dominated Australian aquaculture production since 2005-06, and has been responsible for most of the growth in Australian aquaculture since then. Consequently, Tasmania has the largest aquaculture production followed by South Australia and Queensland. Other significant established aquaculture sectors are prawn farming, oyster farming, Barramundi farming, pearl farming, abalone farming and Southern Bluefin Tuna ranching. There are also several growing aquaculture industries with a limited number of companies that cannot be reported separately (due to commercial confidentiality). These include Yellowtail Kingfish farming, Murray Cod and other native fish, mussel farming, aquarium species, brine shrimp and algae farming.



Over time the value of some industry sectors has increased while others have declined. Prior to the 2000s pearl farming was Australia's highest value aquaculture industry but has since declined due to factors largely beyond control of the industry. These factors include widespread pearl oyster mortality with a poorly defined cause and the impact of the global financial crisis on luxury products and now COVID-19. FRDC and industry are co-funding research to improve pearl oyster health while industry addresses market challenges for the world's best quality pearls. Over the same period Southern Bluefin Tuna ranching has declined in value primarily due to exposure to a dominant Japanese market and the growth of tuna farming in other countries that have access to more preferred tuna species. However, both sectors expect to have improved outlooks in coming years.

In addition to the growth of Atlantic Salmon farming, these declines have been balanced by the rise in production and value from prawn and Barramundi farming that are mostly located in Northern Australia. Both sectors have ambitious growth plans and farm species that have production and market characteristics that are favourable for substantial industry growth. Prawns are a core restaurant menu item and Barramundi provides a consistent, high-quality "white fish" offering. Recent expansion of prawn farming in Queensland has seen an increase in production over the past year with value growing 55% from \$80.4 million in 2018–19 to \$124.6 million in 2019–20 (Schofield, 2021). This increase is expected to continue over the next few years. Oyster and abalone farming sectors continue to show steady growth and are important contributors to regional economies in NSW, Tasmania, South Australia and Victoria. The diversification by the large Atlantic Salmon companies into prawns Yellowtail Kingfish and Barramundi demonstrates that these sectors have good investment potential.

There is also growing optimism for the prospects of new aquaculture opportunities including seaweed farming and shellfish developments in Western Australia. New commercial seaweed farming ventures have recently commenced in Tasmania and South Australia, and a recent Agrifutures Australia funded study predicts that the industry could become a \$1.4 billion aquaculture sector by 2040 (Kelly, 2020). A world first tropical spiny lobster aquaculture farm, Ornatas, based on closed lifecycle has commenced commercial hatchery production in Queensland with plans for additional grow out in Northwest Western Australia. Investments in shellfish farming in Western Australia provide optimism for greater production of mussels, Western Rock Oysters and Akoya Pearl Oysters for consumption, along with the development of Tropical Rock Oyster farming in northern regions.

It is expected the Australian aquaculture industry will exceed the \$2 billion target of the National Aquaculture Strategy 2017 with increasing growth of some established sectors (salmon, oysters, abalone), the recovery of some sectors (pearls, Southern Bluefin Tuna), growth projections from expanding sectors (prawns, Barramundi), and the emergence of new opportunities (seaweeds, shellfish). If an overall 12% improvement above the ABARES predictions (Mobsby et al., 2021) can be achieved the Australian aquaculture industry could be valued at \$2.17 billion in 2026-27.

## National Aquaculture Strategy 2017

We draw the committee’s attention to National Aquaculture Strategy 2017 released by the Department of Agriculture and Water Resources under guidance of Assistant Minister Anne Ruston.

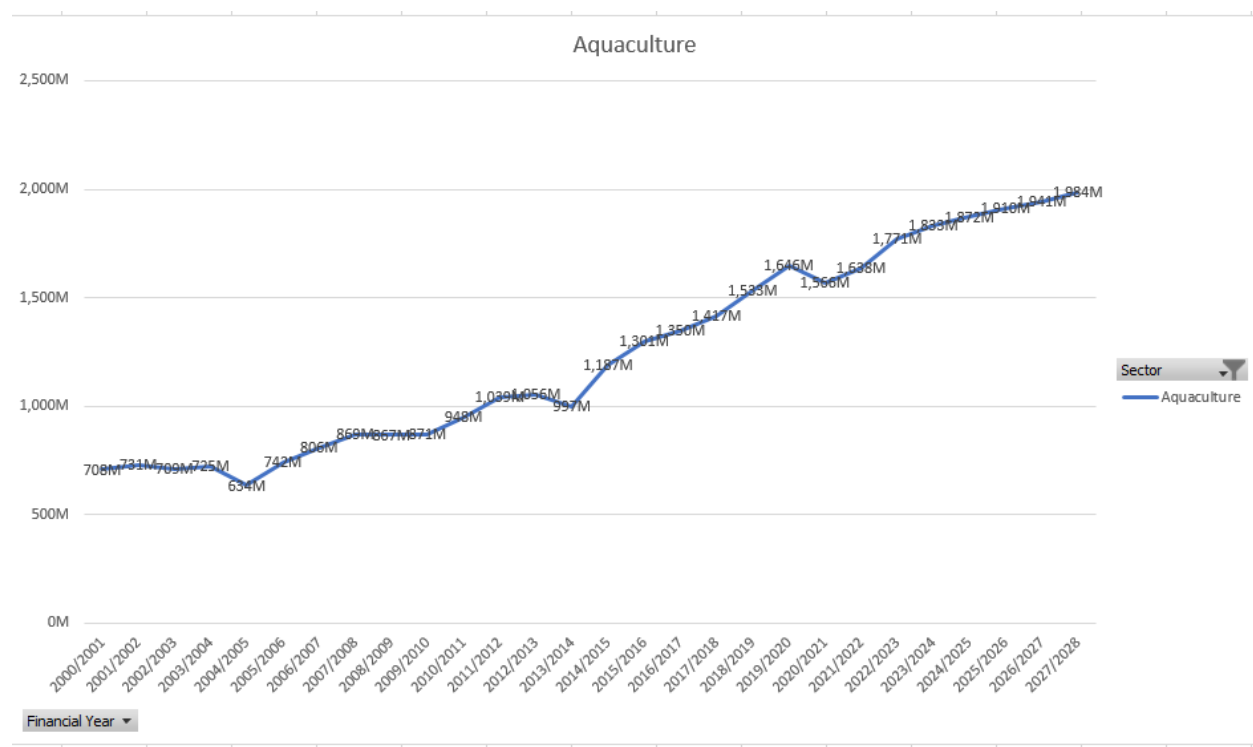
The department undertook a lengthy and in-depth consultation with more than 100 stakeholders and in excess of 60 industry bodies and operators. The Strategy document was, and remains today, to be a clear statement of intent for a growing industry. The Aquaculture development priorities are still relevant and are supported by SIA.

The centerpiece of the National Aquaculture Strategy was the target that “The National Aquaculture Strategy aims to double the current value of Australia’s aquaculture industry to \$2 billion per year by 2027”.

Data obtained from the Fisheries Research and Development Corporation (figure 1) on the value of aquaculture production across the industry in the last 20 years, along with projections of expected growth rates, show a steadily growing industry that is in fact on its way to achieving the target of \$2 billion by 2027.

The value of the sector is being largely led by the growth in production volumes of Salmonoid and Prawn aquaculture, with the salmon industry expected to tip \$1.2 billion of the total \$2 billion value.

Whilst these figures reflect a growing seafood sector that produces fresh, sustainable seafood that is well received domestically and internationally, the sector does face challenges into the future. The opportunity to address these barriers with a whole of industry approach that is supported by government is an opportunity to accelerate growth and improve on the noble target of \$2 billion by 2027.



(Figure 1)

## Opportunities and barriers to the expansion of the aquaculture sector

### 1. Social Licence

The National Aquaculture Plan 2017 correctly identified in priority five that “Improving public perception and understanding of Australian aquaculture as a sustainable industry producing safe and healthy products” is an essential activity to support the growth of the sector. This remains true and must continue to be a focus of the Australian aquaculture industry, coupled with the broader Australian seafood industry as a whole.

Social licence to operate as it relates to agriculture and primary production is not a new concept; rather it is one that most sectors of the agriculture industry have battled historically and continue to do so today. As seen in the recent release of the “documentary” *Seaspiracy*, and the most recent opinion piece released called *Toxic*, which claims to be an expose on the Tasmanian Atlantic Salmon industry. The Australian seafood industry is faced with a challenge of hearts over mind, that cannot be won by relying on science and proven facts alone. Community opinion in the ag-space is often fueled by misinformation that pulls on heartstrings, is highly dramatised, easy to obtain, produced in shareable quantum to appeal to social networking sites, and is easily obtainable on the internet via free, unverified and unregulated sources that are not accountable to peer-review or subject to fact-checking.

Many aquaculture producers find themselves spending valuable time away from their business of producing world-class fresh and sustainable Australian seafood, having to manage the reputational risks levelled at their businesses and operations. The seafood sector has invested valiantly to constantly improving community engagement and education programs in their local communities, and in obtaining a variety of third-party certification programs. This has been done in an attempt to achieve the recognition that should be provided to them of being a source of sustainable protein, constant and reliable regional employment, and a growing and material contributor to the Australian economy. In fact, one in twenty working Tasmanians are directly or indirectly supported by the Tasmanian Atlantic Salmon industry.

In a May 2021 letter to the editor, Colin Buxton, Emeritus Professor, UTAS states “But in the context of salmon farming it may surprise to know that if we put all the Tasmanian salmon cages in one place, they would cover less than one square kilometer, a tiny fraction of our state waters. Tasmanian salmon farming is recognised as being among the best in the world with an Aquaculture Stewardship Council’s tick of approval; an independent, scientifically backed gold standard for environmental stewardship and sustainability. Why is this so hard to understand and accept? Equally disturbing is how the industry is portrayed in the media as anything but responsible...”

Aquaculture stakeholders including industry, government and regulators must unite against misinformation to improve the community’s perception of the Australian aquaculture industry, and enhance its position as a sustainable, responsible source of protein, regional investment and jobs. We must do this through increased support for proactive and reactive community engagement strategies and awareness campaigns.

In addition, we recommend the inclusion of questions around food production and provenance in the next National Census to reveal changes to the level of understanding and attitudes of the Australian public to food, including seafood. This could also be improved with changes to the ABS workforce codes.



## **2. Country of Origin Labelling (CoOL)**

Expansion of mandatory Country of Origin Labelling (CoOL) legislation to food service would provide the opportunity to transform the Australian seafood industry and deliver a powerful economic stimulus while generating important social outcomes around integrity of seafood labelling.

The Australian seafood industry has repeatedly called for current CoOL legislation be expanded to include the mandatory and legislated labelling of seafood sold in food service. This change would transform the Australian seafood industry and deliver a powerful economic stimulus in many regions, while generating important social outcomes around integrity of seafood labelling.

Labelling of seafood requires a unique approach. While nearly all domestic consumption of other major food service proteins such as beef, lamb and chicken is of Australian origin, close to seventy percent of domestic seafood consumption, or \$3.5 billion worth, is imported. Australian seafood consumers are not aware of this, and the situation causes an elevated risk of inappropriate pricing, import substitution and reputational damage to Australian producers.

CoOL is of particular relevance to the aquaculture sector as often a farmed product will be priced at a lower price point making it a closer competitor to imported seafood at the food service level.

Unsurprisingly there has been resistance from the food service sector to expanding the mandatory CoOL legislation to cover food service on the basis the cost imposition to the sector is untenable. When in fact the loss of production value and sales of Australian seafood to the Australian community far outweighs their menu printing costs.

To support an easier transition to mandatory labelling in the food service sector SIA has set out a compromised CoOL policy that provides for the mandatory labelling of Australian seafood on food service menus only. This provides transparency for Australian consumers without levelling an impost on the food service institutions like aged care facilities, prisons and hospitals who are unlikely to be using Australian seafood currently. Rather it focusses the activity in the medium to high food service establishments where most Australian seafood is sold including fish n chip shops, restaurants and premium cafes.

See SIA's complete submission to the Evaluation of Country of Origin Labelling for Food [here](#).

## **3. Improved market access – Domestic and Export**

Australia's largest seafood production enterprise, Tassal Ltd, noted in their latest Annual Report that domestic seafood demand appears to be unfulfilled, resulting in a likely upward price outlook in the near term (Tassal Ltd, 2018). In 2021, following on from the impacts of the 2020 Covid-19 pandemic we have seen a dramatic spike in domestic consumption of seafood. The health benefits of seafood along with the improved access to fresh Australian seafood through supermarket chains and independent retailers has strengthened consumption patterns. The aquaculture sector is well placed to take advantage of the rising levels of demand in Australia.

Supported by a streamlined government regulatory system, access to resource to expand production capacity and managed input costs, Australian aquaculture can ensure competitiveness against rising levels of imported seafood.

Current government and industry focus on market diversification and access is a timely support to aquaculture businesses who are looking export markets to drive production growth and profitability.

Given the higher cost structure of the Australian aquaculture production relative to global competitors, Australian seafood will need to be supported in accessing premium channels in the more affluent markets, particularly in the Asia-Pacific region where “brand Australia” has an established premium value and seafood forms a large part of the diet.

We advocate for the Government’s continued support of innovations that increase the traceability of Australian seafood products, including Australian aquaculture products, along the supply chain to confirm quality, safety and sustainability credentials of seafood products, and provide the capacity for investigation and enforcement of seafood fraud. Traceability support systems that underpin the safety and integrity of Australian seafood products consequently, underpin and support confidence in brand Australia.

The industry needs to be supported in our development of a strategic, evidence-based brand and export strategy underpinned by a combination of desk and in-country research in both premium retail and food service channels. One of the vitally important platforms of the export strategy needs to be to build export capability and readiness within industry. Whilst have access to relevant Government data, reports and services including, but not limited to Austrade and DFAT.

#### **4. Department of Agriculture, Water and the Environment – Dedicated Aquaculture Team**

SIA recommends the establishment of a dedicated team within the Fisheries Team of DAWE to elevate, manage and continue the implementation of the National Aquaculture Strategy 2017. A core team must be established, resourced and tasked to drive this strategy to achieve national aquaculture industry development goals.

Ideally this body should combine a balance of expertise and knowledge, and operate as a meaningful collaboration to actively progress the National Aquaculture Strategy through to 2027 together with addressing key recommendations from this inquiry.

Seafood Industry Australia and its members are well placed to work closely with the DAWE Fisheries and Aquaculture team to accelerate developments, improve knowledge sharing and collaboration between government and industry.

#### **5. Aquaculture zones and expansion into Commonwealth waters**

It has been suggested that regulatory burden can be reduced through the use of designated aquaculture zones. There are well documented cases in South Australia and Western Australia where dedicated zones have proved beneficial in streamlining consultation with all stakeholders and extending through to the environmental and planning approvals process. Increased efficiency in securing approvals decreases the perceived risk as assessed by financial institutions when assessing an aquaculture operation’s application for capital funding.

For example, under the Aquaculture Act 2001 (SA), South Australia has 12 dedicated aquaculture zones where aquaculture production leases can be established.

The development of aquaculture zones and expansion of aquaculture leases into Commonwealth waters is an opportunity that SIA supports if it can reduce regulatory burden and improve support for expansion of aquaculture productivity and production.

## **6. Biosecurity**

SIA supports and endorses the Australian Barramundi Farmers position on biosecurity in full.

For the aquaculture industry to reach its full growth potential, it is essential that optimal health of farmed stock is maintained, and significant disease impacts are minimised. The competitive advantage of being free from many important diseases also must not be jeopardised.

The most effective mechanism used globally in animal production systems to reduce the risk of external disease incursion is the maintenance of a high level of biosecurity. This must occur across all levels, from the country border to the individual tank or pond. Importantly and uniquely, once a disease is in the aquatic environment, it is highly unlikely it can be controlled.

There are currently no mandatory requirements to decontaminate (e.g., cook) imported species that have the possibility of carrying exotic pathogens of concern, or processing wastes (gills, guts, skeletons). There is currently no routine post-border testing performed on imported uncooked whole and eviscerated seafood commodities, so the prevalence of exotic pathogens in imported seafood is unknown. There is currently no routine assessment of imported uncooked eviscerated seafood relative to import conditions, so the compliance of imported seafood to import conditions is not known. There are currently no measures that prevent further processing of imported uncooked whole and eviscerated seafood. There are no functional controls on uncooked processing waste to prevent it being discarded or released into natural waterways as bait, burley, or cheap disposal. And, there are currently no methods in use to categorically determine the country of origin or differentiate farmed and wild-caught whole and eviscerated seafood. Thus, there remains an avenue for product substitution that can avoid some controls on aquaculture product.

An independent surveillance study commissioned by the Australian Barramundi Farmers Association, will shortly be published, and we anticipate this report will demonstrate the current controls are failing.

We hold valid concerns that can only be addressed through an in-depth review and update to the 1999 IRA. We have iterated our willingness to offer support and resources to back the department to accomplish this as a matter of urgency.

## **7. Investment in regional infrastructure**

As with other aspects of the agriculture industry, the fisheries sector would benefit from investment in off-farm infrastructure, from cold-chain facilities in regional areas to more general infrastructure such as improved telecommunications and space-based infrastructure systems, better roads and transport, and social infrastructure in regional and rural areas like schools and hospitals.

Infrastructure improves access to markets and lowers transaction costs for businesses, reduces reliance on government support, increases regional productivity and output and creates new jobs in regional areas. (FRDC submission into the Inquiry into growing Australian Agriculture to \$100 billion by 2030).

There is an opportunity for governments to co-invest with the aquaculture sector, and potentially other sectors, to establish regional processing cooperatives to develop new product forms and distribution channels through economies of scale and co-investment in research and development. Such investment has the potential to grow jobs in regional areas across Australia.

## **8. Regional workforce and skills shortages**

The Australian aquaculture industry needs to develop a suitably qualified and experienced workforce to support a rapidly growing industry and also offer that workforce appropriate incentives where the work available is in remote regional areas.

There is a requirement for industry and governments to build skills to meet industry growth needs, including professional development for current staff and industry participants, aligning training with industry needs, and promoting career opportunities in the Australian aquaculture industry among regional communities.

Where needs can't be met domestically, the aquaculture sector has a significant interest in filling skilled labour needs with skilled migrants. The growth of the aquaculture sector and its skill needs must be reflected in policy associated with funding and places for training and migration. Covid-19 has limited access to the foreign labour market and many SIA members have looked to the domestic labour market for increased capacity with very little success.

As an industry, we need to take a stronger approach to attracting and retaining labour to the entire seafood industry, including aquaculture. SIA sees great benefit in establishing a National Australian Seafood Careers Platform. The platform will offer a national solution to attracting and retaining labour, including the creation of an industry entry point via a "blue card" certification. The Blue Card will create a database of labour that can be used to promote careers and further training opportunities. Facilitating and co-ordinating the movement of existing labour between fishing and harvesting seasons, and regional locations will provide security and improved retention of labour.

See SIA's complete submission to the National Agriculture Labour Advisory Committee [here](#).

## 9. Challenges of Environmental regulation

Aquaculturalists rely on a clean and healthy environment for their operations and support appropriate controls to protect the environment. Uncertainty and excessive regulatory burden on industry stifles innovation, long-term investment, employment, development incentive and profitability. Aquaculture legislation is frequently tortuous and covered by too many regulations. After many reviews into regulatory burden, it is still far too difficult to navigate the process, across agencies often with different objectives, too narrow a focus, with veto powers, or the capacity to cause substantial and costly delays.

Many current measures are not science-based or are applied without a comprehensive understanding of aquaculture practices and impacts. In Queensland, new sediment and nutrient emission standards for aquaculture under the Reef protection regulations commence on 1 June 2021. Aquaculture operators will be required to meet new discharge standards to ensure new development does not worsen nutrient or sediment pollutant loads – that is have no residual impact.

The high conservation value of the reef is respected, however CSIRO research has demonstrated most nutrients from prawn farming are assimilated in the receiving environment, far away from the reef, and have had no adverse impacts. Introducing a zero-discharge regime on aquaculture will stymie the growth of the industry in Queensland, but will do nothing to save the reef.

As an industry, we have unsuccessfully proposed that nutrient and sediment loads be based on the residual nutrients after environmental assimilation in the receiving environment has been reviewed. For example, on the intake side, at certain times of the year, discharge from barramundi farms can be demonstrably better quality than intake water. Therefore, our Barramundi aquaculturalists have argued that the net load in intake water should be deducted from the net load released in the receiving environment. To do otherwise is to penalise producers for environmental services. Regulation must acknowledge this. The use of advanced technologies such as remote sensing could be an excellent auxiliary in this field.

A key barrier identified in the Cooperative Research Centre for Developing Northern Australia (CRCNA) report was high environmental and regulatory hurdles; a lack of coordinated, science-based, aquaculture policy and implementation, and lack of clear and navigable regulatory pathway. To achieve stronger and adaptive governance of the Australia aquaculture industry the report recommended additional planning is required to determine an appropriate mechanism/structure for strengthened governance, and we echo this statement.



## **Conclusion**

In summary, the Australian aquaculture industry has scope to grow both from a production and economic point of view. To do this, we need the support of the Government as outlined in recommendations 1-9. As a sector, Australia's aquaculture producers are consistently penalised to an extent far beyond other land and water users, purely because we are new sector. An evidence-based, streamlined approach to environmental regulation, in partnership with industry, is needed to allow Australian producers to do what we do well – responsibly produce high quality, healthy and sustainable seafood products for domestic and international markets, while providing economic opportunities and employment in regional and remote Australia.

There are opportunities to streamline and increase the effectiveness of the current regulatory frameworks that govern aquaculture activities in Australia. The negative impacts on productivity for the industry arising from complex, inconsistent and overlapping regulatory frameworks has been identified as a key limiter to industry operations and growth. Further progress, based on scientific evidence, is needed to set realistic harmonised regulatory requirements, and improve the approval pathway for aquaculture development.

We thank the Standing Committee on Agriculture and Water Resources for the opportunity to comment on the Australian aquaculture sector and look forward to the recommendations of this enquiry. I welcome the opportunity to discuss this submission with you further and can provide more detail if needed. I would like to thank you in advance for your support in the future of Australia's aquaculture industry, and the wider Australian seafood industry.

Yours sincerely,

**Veronica Papacosta**  
**CEO, Seafood Industry Australia Ltd**

28 May 2021