



AUSTRALIAN
**Prawn
Farmers**
ASSOCIATION

30th July 2014.

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[http://www.aph.gov.au/Parliamentary Business/Committees/Senate/Rural and Regional Affairs and Transport/Seafood labelling](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/Seafood_labelling) or phone (02) 6277 3511.

Closing date for submission **1 August 2014**.

Senates Rural and Regional Affairs and Transport References Committee Inquiry into the current requirements for labelling of seafood and seafood products.

This submission has been prepared by the Australian Prawn Farmers Association (APFA).

INTRODUCTION.

APFA thanks the Rural and Regional Affairs and Transport References Committee for the opportunity to put forward our case for extending country of origin labelling to include all fish cooked in restaurants and other cooked seafood outlets.

APFA had noted with applause the assurance issued in March last year by then Senator Ron Boswell - an acknowledged champion of Australia's Seafood Industry - that country of origin labelling of fish sold in restaurants and other cooked seafood outlets "will be a matter of priority under a Federal Coalition Government".

APFA members who have been repeatedly frustrated after successive inquiries and the seemingly inevitable shelving of the matter, welcome this Inquiry as part of the latest round of federal government initiatives - hopeful that at last we can get resolution and progress this issue to finality as Ron Boswell and others have advocated with much determination and passion for many years.

The Northern Territory has already adopted the measure and I refer Committee members to a detailed survey undertaken there which shows conclusively - retail and consumer acceptance for CoOL for fresh and cooked seafood. Both producers and retailers acknowledge they have benefitted from extending seafood CoOL.

Surely it is now time for this measure to be uniformly applied in all states.

APFA considers all that is required now is the political will to implement the change.



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The fish buying public deserve no less. They have a justifiable right to know where the product they are buying originates from.

That the simple addition of either the word AUSTRALIAN or IMPORTED - a non costly requirement - must be added to restaurant and cooked seafood outlets menus or chalk boards which will give consumers great clarity and confidence in making their choice and most importantly the fraud of product substitution would be made much harder.

Firm support for the above has been clearly demonstrated in the Northern Territory survey.

Only mandatory CoOL will give consumers a clear choice between locally sourced or imported product.

Of course price of local verses imported product - especially with prawns and barramundi will be very apparent - but it is up to the customer to decide in the full knowledge of what is being offered i.e. Australian or Imported - of what they want to select and pay for.

Both APFA and ABFA fear - if consumers aren't able to identify where their seafood actually originates and that it complies with strict hygiene regulations - they will simply cease to purchase seafood.

APFA's DETAILED SUBMISSION.

The Association has considered carefully the terms of reference and our submission makes points that address the questions raised and pertaining to the Australian farmed prawn industry.

While APFA is making this submission on our behalf, we also support the Australian Barramundi Farmers Association (ABFA) plea for CoOL to encompass all retailed seafood. It is an issue of crucial importance and one that involves the future health of all Australians.

APFA holds grave and growing concerns around bio security and potential health hazards when fish is sourced from outside Australia.

A White Spot disease outbreak here would be catastrophic.



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It is very evident the current labelling system does not provide enough information for Australian consumers to make informed purchasing decisions. Non labelling and substitution of Australian seafood is an ongoing racket involving some restaurant and fish trade shops.

While APFA compliments major retail chains and responsible seafood outlets who have embraced CoOL, members remain alarmed that non labelling of fish product is still widespread throughout Australia. Substitution of overseas product for more costly and sought after Australian product is rife.

A product substitution of special concern to AFPA members involves retailers offering Tiger Prawns imported from Asia as Australian Wild or Australian farmed Tiger Prawns. Convictions have been recorded for this offence which is difficult to detect.

These prawns are the same species (*Penaeus monodon*) and are virtually indistinguishable. Because of this, unscrupulous retailers feel safe from detection from State authorities.

Our Barramundi farming colleagues attest to encountering the same problem with their fish species and this continues despite the sound proactive initiative of internationally registering the uniquely indigenous marketing name - 'Barramundi' as applying only to that species of fish sourced and produced in Australia.

We draw the committee's attention to recent dire warnings from the World Health Organisation (WHO) believe that antibiotic resistance now poses serious threats to global health (abc news 02/05/14) <http://www.abc.net.au/news/2014-05-01/antibiotic-resistance-poses-threat-to-global-health-who-report/5422080>

It is acknowledged that many overseas fish and prawn farms use antibiotics to ensure a harvest, In some cases our association has been told these farmers as using "last resort" antibiotics which here in Australia are used to treat and prolong human life in the most difficult cases. Recently reported in the Brisbane Courier Mail on May 01, 2014 - "last resort" antibiotics are losing their ability to fight bacteria. <http://www.couriermail.com.au/lifestyle/health/drugresistant-superbugs-spreading-making-diseases-untreatable/story-fnihoyeo-1226901538363#mm-register>

Product from these farms can be and is sourced, imported and sold here.

More and more seafood consumers are fast becoming aware of the inadequate hygiene and safety regulations of some overseas producers.



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Consumer demand for CoOL is as the National Seafood Industry Association has stated - "is far higher in seafood than any other food group."

"It gives the consumer the ability to identify seafood from unregulated fisheries.

"The high standards in sustainability, safety and hygiene in Australia place additional cost of the Australian industry - so without. Ring able to effectively identify our product in the market place, these measures simply restrict our. Unity to compete.

APFA members pride themselves on not having to use chemicals including antibiotics and pesticides in their farming operations.

Results of the latest tests of our farmed prawns conducted by the Federal Governments Department of Agriculture, Fisheries and Forestry are in. Of 60 chemicals tested for - including some "last resort" antibiotics - none were detected.

See attachment A

Over prescription of antibiotics in Australia has already rendered many of our commonly used antibiotics – in human medicine - next to useless and APFA fears that consumers unknowingly consuming "last resort" antibiotics will just hasten their demise as an effective weapon in the most serious of health cases.

From a June 2013 Senate, Finance and Public Administration References Committee - Progress in the implementation of the recommendations of the 1999 Joint Expert Technical Advisory Committee on Antibiotic Resistance reported that only 5% of raw imported seafood entering Australia is tested for antibiotic residue.

This same report referred to a Customs incident where. ***"Importation of seafood from Vietnam where the levels of antibiotic residues in that seafood were above the acceptable levels of antibiotic residues in that seafood were above the acceptable limits. If I was prescribing to you the antibiotics they were talking about, Senator, I would have to call Canberra get permission to use that drug, yet in a foreign country it was just being fed to the seafood to make it grow faster."***

http://www.apf.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/Completed_inquiries/2010-13/jetacar/report/index



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Warnings have been consistently sounded on this vexatious issue under your consideration.

Those voicing concerns include Australia's Chief Scientist, Professor Ian Chubb and Australia's Chief Medical Officer, Professor Chris Baggoley and a host of researchers and experts in this field - including Dr Paul Willis from the Royal Institute of Australia.

Australian seafood producers have to meet strict conditions in terms of the environment, costs, regulation, labour conditions and animal health. By importing 70% of our seafood we abrogate our environment concerns to countries that don't have to meet the same conditions that Australia imposes on the industries that produce food products. This is a message that has been the subject of papers by Robert Kearney, PhD, DSC, AM, Emeritus Professor of Fisheries, University of Canberra.

APFA contends - not only is the antibiotic resistance message not being addressed the potential for customers to be ripped off by exorbitant pricing from product substitution of cheaper overseas product poses a major human health and pest risk.

Compliance and Enforcement of an all states, mandated, extension of CoOL would simply involve adding an inspection of restaurant and cooked seafood outlets menus to the check list health food and safety regulators currently have to enforce when they inspect these retail premises.

Proof of detecting product substitution is at hand too - Australian developed and proven technology can and should be employed.

Physi-Trace testing technology - a breakthrough testing regime developed and perfected by Dr John Watling at the University of WA - can establish the provenance of Australian and overseas prawns - using their natural elemental fingerprints. The same technology can be applied to any farmed fish species.

Physi-Trace is currently used by the Australian Pork Industry and others for trace back and country of origin monitoring. The technology is proven in case law.

See Attachment B

APFA recommends when seafood substitution is detected a twostep process must be followed.



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Firstly - a visit and discussion with the retailer, plus follow up monitoring, and a warning letter.

Secondly - information passed to the State regulatory authority or the ACCC for investigation.

However we envisage the ACCC generally will only become involved if it is a national or large company doing the wrong thing, and if there is interstate trade involved.

There should be media releases issued when charges are laid and convictions result.

Once knowledge spreads through the retail and cooked seafood outlets that Physi-Trace testing will be employed to eradicate substitution and reinforce mandatory CoOL - APFA considers such an enforcement tool would act as a salutary deterrent and is a cheap and effective way of enforcing legislative regulations.

However our members need the regulatory assurance mandating CoOL across all seafood outlets before consideration can be given to out laying the necessary funds.

APFA considers - compelling all seafood retailers to publish where their product comes from is firmly in the national and consumer interest. Enforcement technology is at hand and we urge members of this Inquiry to summon up the political will to institute this long overdue consumer information and protective measure.

Members from APFA are only too willing to appear before your committee to make our case and give you any further information you may require.

Yours sincerely

Helen Jenkins
Executive Officer
Australian Prawn Farmers Association