

13 September 2025

Submission to The Parliamentary Joint Committee on Law Enforcement

Combating Crime as a Service

From: Seafood Consumers Association Ltd (ABN 846 862 508 59)

The Seafood Consumers Association (SCA) thank you for the opportunity to comment on this important subject. We specifically note that the *Pursuant to subsection 7(1) of the Parliamentary Joint Committee on Law Enforcement Act 2010, the committee will inquire into and report on the challenges and opportunities for Australian law enforcement in combatting Crime as a Service, with reference to:*

- 1. the nature and impact of these and other technology-driven advancements on criminal methodologies and activities, including the use of cryptocurrencies.*
- 2. the impact of these types of technology-driven crimes on Australians, including with regard to age, gender, socio-economic status and business type.*
- 3. challenges and opportunities for Australian law enforcement in combatting these and other evolving criminal methodologies.*
- 4. whether the existing legislative, regulatory, and policy frameworks to address these and other evolving criminal methodologies are fit for purpose; and*
- 5. the approaches being taken by law enforcement in other countries and internationally.*

Who we are:

The Seafood Consumers Association (SCA) Limited is an Australian non-profit charity organisation (recognised by ACNC on the Australian Charity Register – ABN 846 862 508 59) dedicated to empowering and advocating for seafood consumers. SCA promotes the critical role seafood plays in human nutrition— helping to prevent chronic diseases like heart conditions and diabetes—and strives to ensure consumers have access to accurate, science-based information so they can make informed choices about their seafood.

The Association actively works to safeguard consumer rights by providing resources on seafood safety, sustainability, health benefits, species profiles, and environmental impacts while also lobbying for stronger laws and greater transparency within the seafood industry. Guided by a specialist international advisory board, SCA is committed to raising awareness, building knowledge, and protecting the interests of seafood consumers in line with its vision for a healthy, sustainable, and transparent global seafood sector. Our website is <https://www.seafoodconsumers.global/>.



## Introduction

Technology-driven criminal methods—especially those classified as Crime as a Service (CaaS)—are increasingly impacting the Australian seafood sector through the CADMUS spectrum: Counterfeit, Addition, Dilution, Mislabelling, Undisclosed, and Substitution. These crimes leverage digital platforms, fake websites, frauds, and the use of cryptocurrencies to bypass regulations, deceive consumers, and undermine food safety, traceability, and confidence. SCA brings the consumer perspective, advocating for modern, responsive solutions across law enforcement, regulation, and domestic/international collaboration.

## Recommendations

1. Mandate digital traceability for all seafood products, from import to sale, leveraging blockchain and AI for authentication.
2. Enable real-time collaboration between law enforcement, food safety, consumer protection, and financial agencies across all states/territories.
3. Modernize laws to address crypto-enabled, online, and tech-driven seafood fraud, with appropriate penalties and rapid digital takedown powers.
4. Expand consumer and small business education programs about seafood fraud and reporting mechanisms. Strongly consider collaborating with us and other similar Consumer Associations.
5. Participate in international initiatives for sharing threat intelligence, certification, and enforcement capacity.
6. Australian Fish Names Standard AS5300 - Mandate Use of AFNS in Digital Export and Import Documentation. Require Australian exporters and importers to use AFNS standard names in all digital customs and trade documentation to ensure consistent species identification across the supply chain. This will assist any food recalls and will build trust. FSANZ have adopted a voluntary approach to the AFNS and this needs to be immediately changed to MANDATORY to create confidence and trust by all in the seafood chain, including the consumer.



7. Update the Harmonized System (HS) for Seafood. Reform the HS codes to align accurately with Australia's Fish Name Standard AS5300-2019 (AFNS) and CAAB Codes, reflecting species-specific identification and product forms, including distinctions between wild capture and aquaculture. Automate Customs Clearance with AFNS-Aligned Systems.
8. Align with the Submission to the Productivity Commission Inquiry 'Harnessing Data and Digital Technology' to maximise the information and opportunities.
9. Listen to The Economist' podcast Scam Inc which details their investigations about the criminality of scamming and (tongue in cheek!) even view the movie 'The Beekeeper' which whilst it is made for entertainment purposes and not based on a true story does pose some important questions as based on a modern-day phishing scam issue.

## **1. Nature and Impact of Technology-driven Advancements on Criminal Methodologies (Including Cryptocurrencies)**

CADMUS crimes use sophisticated, technology-enabled methodologies:

- ☐ Digital Scams and Fake Websites:  
Criminals use professional-looking e-commerce sites, phishing, and bulk social/email campaigns to sell mislabelled or unsafe seafood, often mimicking legitimate businesses.
- ☐ Cryptocurrency-enabled Transactions:  
Bad actors exploit anonymous payment channels—particularly cryptocurrencies—to facilitate trade in fraudulent, misrepresented, or unregulated seafood, making tracing and enforcement difficult.
- ☐ AI and Automation:  
Automated fraud detection evasion, supply chain manipulation, and real-time duplication of certification documents are advancing, complicating the job of inspectors and law enforcement.

This evolution increases both the frequency and sophistication of crime, outpacing legacy compliance frameworks and expanding consumer vulnerability. SCA recently learned at 'The Economist' Summit in Melbourne (3-4 September 2025) of the deep criminality engaged in many industries – recommend that you connect with Sue-Lin Wong (Australian



Correspondent for 'The Economist' based in Singapore or, at least, listen to the podcast Scam Inc which details some of their investigations.

## 2. Impact on Australians (Age, Gender, Socio-Economic Status, and Business Type)

Technology-driven seafood crimes significantly affect many Australians:

- ☐ Vulnerable Populations:

Older Australians and those with limited digital literacy are disproportionately impacted by fraud, frauds, and mislabelling, leading to economic loss and health risks.

- ☐ Socio-Economic Factors:

Lower-income households—often seeking budget seafood alternatives—face higher risks of exposure to adulterated, substituted, or unsafe products.

- ☐ Small Businesses and Foodservice:

Independent seafood retailers and small hospitality businesses relying on online suppliers may unknowingly source from fraudulent or unregulated channels, risking brand reputation and legal penalties.

- ☐ Gender and Community Impacts:

No direct gender differences seen, but consumer distress from frauds varies in reporting and support-seeking, with women more likely to proactively raise concerns, as identified in national fraud statistics.

The cumulative impact undermines trust, health, and livelihoods across demographic and business segments.

## 3. Challenges and Opportunities for Australian Law Enforcement

Challenges:

- ☐ Fast-evolving tech: Techniques like crypto payments, anonymous marketplaces, and fraud automation move faster than regulatory adaptation.
- ☐ Resource limits: Agency collaboration is often siloed between food, consumer law, and cybercrime enforcement. In Australia, as we found during COVID-19 we were no longer Australians but became 'prisoners of our state/territory' and differences between the



Federal, States and Councils often exist which in a small, populated country like Australia should not be happening.

- ☐ Supply chain opacity: Seafood—an imported, multi-step commodity—lacks universal traceability and authentication.

Opportunities:

- ☐ Deploy AI analytics and blockchain-based traceability for rapid detection and verification.
- ☐ Strengthen multi-agency taskforces, integrating cybercrime, consumer fraud, and food safety units.
- ☐ Partner with global technology companies for instant takedown of fraudulent e-commerce and fraud sites.
- ☐ Promote to Food Standards Australia New Zealand (FSANZ) that the Australian Fish Names Standard AS5300 (AFNS) should be lifted to mandatory as against its current voluntary status.

#### **4. Fitness of Legislative, Regulatory, and Policy Frameworks**

Current frameworks provide baseline protections but have notable gaps:

- ☐ Outdated coverage: Many seafood fraud methods (substitution, digital mislabelling, crypto-enabled sales) are not clearly addressed.
- ☐ Enforcement tools: Powers to swiftly freeze crypto accounts, block digital sales, or force real-time product takedowns are inadequate.
- ☐ Coordination: Fragmentation between food safety, cyber, consumer protection, and financial regulatory frameworks hinders response.

A fresh transparent approach is needed—mandating digital traceability, fraud reporting integration, and sector-specific rapid enforcement.

#### **5. International Law Enforcement Approaches**

Other authorities demonstrate advanced solutions:

- ☐ The EU's food fraud task forces integrate blockchain certification, cross-border intelligence sharing, and strong collaboration with customs authorities.



- ☐ The US uses FDA’s seafood import monitoring and cyber-policy enforcement, plus trade controls against fraudulent sources.
- ☐ Singapore employs real-time product authentication apps and has invested in consumer mobile alert integration.

Australia should build on these models by strengthening partnerships, embracing digital innovation, and fostering international intelligence sharing. Cyber-crime is international; it can only be defeated by international partnerships.

## **Key References and Examples**

### **Australian Consumer Seafood Fraud and Scam Data:**

“Unpacking the Consumer Seafood Experience” (FRDC, 2021): Documents widespread mislabelling and substitution in Australian seafood retail channels, outlining observed consumer harm and financial loss.[1][2]

ACCC Scamwatch: Reports fraud losses exceeding \$100 million in early 2025, with phishing and fake websites prominent in food sectors.

### **CADMUS Framework in Practice:**

“Food Fraud: Key Issues and Mitigation Strategies” (Comprehensive Reviews in Food Science, 2022): Describes global seafood fraud typologies, including counterfeit species and unregulated imports.

GlobeScan MSC Consumer Perceptions Survey (2024): Notes rising consumer distrust in seafood authentication, especially among older and lower-income demographics.[3]

### **Cryptocurrency and Criminal Methodologies:**

Danenberg & Remaud, “Australian Consumers' Attitudes Towards Credible Seafood Information” (Appetite, 2010): Discusses consumer confusion linked to digital frauds and inability to authenticate purchases.[4]



“Greenwashing in Australia's Meat and Seafood Industry” (Faunalytics, 2025): Details how frauds and misrepresentation use digital payments and fake certification logos.[5]

### **Law Enforcement and Regulatory Gaps:**

Parliamentary reports on seafood traceability reform and country-of-origin labeling (Department of Agriculture, Fisheries).[6]

InsideFMCG and SIA releases on COVID-era consumer campaigns and subsequent policy pivots. [7]

### **International Best Practice:**

EU Food Fraud Taskforce (European Commission, 2023): Combines blockchain traceability and coordinated customs enforcement.

FDA Seafood Import Monitoring Program (USA): Leverages electronic recordkeeping and cyber policy enforcement.

### **Australian Government and Parliamentary References:**

Parliamentary Joint Committee on Law Enforcement Inquiry Terms of Reference

“A Profile of the Australian Seafood Consumer” (USC, 2025): Profiles consumer vulnerabilities, demographic risk factors, and cybercrime implications.[4]

### **Practical Examples**

#### **Operation OPSON (INTERPOL/EUROPOL):**

International law enforcement operation targeting counterfeit and mislabelled food, including seafood. Resulted in millions of items seized worldwide and multiple successful prosecutions.

### **Australian Regulatory Evolutions:**

Recent reforms in country-of-origin labeling for seafood in hospitality settings reflect government response to consumer fraud risks.[6]

### **Singapore's Seafood Authentication App:**

Real-time digital tool enabling consumers and regulators to verify the legitimacy and provenance of seafood products via blockchain-registered data.

These references and examples support the Submission's case for urgent regulatory, law enforcement, and technology-driven reforms, and illustrate the scale and significance of CADMUS risks in the modern seafood sector.

1. [https://www.frdc.com.au/sites/default/files/2021-06/2019\\_UnpackingConsExp\\_12pp.pdf](https://www.frdc.com.au/sites/default/files/2021-06/2019_UnpackingConsExp_12pp.pdf)
2. [https://www.frdc.com.au/sites/default/files/2021-06/2019\\_Unpackingseafoodexperience\\_report.pdf](https://www.frdc.com.au/sites/default/files/2021-06/2019_Unpackingseafoodexperience_report.pdf)
3. <https://marketac.eu/wp-content/uploads/2024/06/MSC-Presentation-GlobeScan-Survey.pdf>
4. [https://research.usc.edu.au/view/pdfCoverPage?instCode=61USC\\_INST&filePid=13127277900002621&download=true](https://research.usc.edu.au/view/pdfCoverPage?instCode=61USC_INST&filePid=13127277900002621&download=true)
5. <https://faunalytics.org/greenwashing-in-australias-meat-and-seafood-industry/>
6. <https://oia.pmc.gov.au/sites/default/files/posts/2023/07/Consultation Paper.pdf>
7. <https://seafoodindustryaustralia.com.au/seafood-industry-australia-builds-trust-in-brand-australia-through-seafood-traceability-initiative/>

### **Conclusion**

CADMUS-driven Crime as a Service poses urgent, technology-enabled risks to Australia's seafood consumers and broader food system. Coordinated legislative, regulatory, enforcement, and educational solutions—embracing global best practice and new digital tools—are essential to restore trust, safety, and transparency.



## SEAFOOD CONSUMERS ASSOCIATION LIMITED

Greater use of data and digital technology in the seafood supply chain supports Australia's productivity, innovation, and consumer protection goals. These recommendations meet Governments priority reforms to enhance productivity.

The Seafood Consumers Association urges the Parliamentary Joint Committee on Law Enforcement inquiry into Crime as a Service to promote and adopt a consumer-focused approach in its recommendations, ensuring all Australians benefit from a safer, more transparent, and digitally connected seafood industry.

If Australia made such effort on Harnessing Data and Digital Technology, then the Seafood Consumer Association passionately believes we could eliminate Illegal, Unreported and Unregulated (IUU) activities – the fact that millions of dollars of taxpayer's funds have been spent on CAAB and AFNS systems/operations the Seafood Consumer Association believes the time is right to connect the systems to maximise Australian leadership and show the world how this can be achieved. This approach should also be taken internationally to highlight Australia's initiative.

The Seafood Consumers Association welcomes the opportunity to contribute to the Parliamentary Joint Committee on Law Enforcement inquiry into Crime as a Service, and government service delivery for all Australians.

The Seafood Consumer Association would be prepared to collaborate with the Parliamentary Joint Committee on Law Enforcement inquiry into Crime as a Service to help improve the systems as outlined.

Yours sincerely

SEAFOOD CONSUMERS ASSOCIATION LTD

Hon Prof Roy D Palmer

CEO