

## **Australian Southern Bluefin Tuna (SBT) Industry Association (ASBTIA)**

### **A submission to the Parliamentary Inquiry into the biosecurity risks associated with the importation of seafood and seafood products (including uncooked prawns and uncooked prawn meat) into Australia**

For the attention of:  
The Senate Rural and Regional Affairs and Transport References Committee  
Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and Transport  
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## **Summary**

The Australian SBT farming industry, based in Port Lincoln, uses up to 50,000 tonnes of bait pa. Normally about 40,000t of that comes locally from quota-managed fisheries, and about 10,000t is imported.

The imported bait, all from **wild** stocks, is subject to very strict licence conditions pre-border, at the border, and post-border. The SBT industry supports these regulations – even though they are far stricter than any other tuna farming area in the world and make us less competitive.

These strict import conditions were strengthened by the 1999 Import Risk Assessment (IRA) for Salmonid and non-Salmonid finfish. Import of bait for tuna farms was a core part of that IRA – and the IRA conclusions and resulting import conditions were then tested by a World Trade Organisation (WTO) Technical Expert Panel and found to be sound.

We support the submissions to this Inquiry by the two peak seafood bodies in Australia – the National Aquaculture Council (NAC) and the National Seafood Industry Alliance (NSIA). Those submissions note that the potential biosecurity threats are from aquaculture supplies – not from the wild (as used in tuna farming).

## **Requests**

- (1) We support the proposals from NAC and NSIA for further IRA's, where required, targeted at specific situations of higher risk (eg Barramundi). This will produce earlier results and seem to be the best use of resources.
- (2) There appears to be a need for tighter post-border controls in some cases.
- (3) Special import tariff codes, as outlined for Barramundi in the NAC submission, need to be considered.

## **Background**

ASBTIA represents the Australian SBT industry, largely based in Port Lincoln, South Australia. The industry pioneered global tuna farming in 1991. Farming is now the system used to produce the large majority of the world's premium Bluefin Tunas.

Aside from Australia, the major Bluefin Tuna producing areas are – Atlantic Bluefin in the Mediterranean, and Pacific Bluefin in Japan and Mexico.

The industry is Australia's largest aquaculture exporter – around \$130-290 million pa, depending on exchange rates and world prices. It generates

around 1,800 full-time jobs in SA, and underpins the Eyre Peninsula economy. The tuna industry has heavily re-invested surplus funds into the regional communities – especially tourism, food manufacturing, waste processing and other seafood.

The industry is committed to developing the Eyre Peninsula region with Port Lincoln the main centre – in the same way that cities such as Tamworth and Orange have developed. This means investing in globally competitive industries.

### ***SBT***

SBT is a highly migratory species – swimming from the west Indian Ocean (South Africa) to NZ each year. The single spawning ground is in the Java Sea. Its main feeding ground is the Great Australian Bight (GAB) – from December to March each year.

SBT is managed internationally by the Commission for the Conservation of SBT (CCSBT). The CCSBT Members are Australia, Japan, Korea, Taiwan, Indonesia, South Africa and the EU. Australia and Japan each have 36% of the global catch quota.

The global quota is set each three years by a scientific model - called a Management Procedure (MP). Since the MP was introduced in 2012, the global and Australian quotas in tonnes have increased:

	<b>Australia quota (t)</b>	<b>Global quota (t)</b>
2009-11	4,015	9,449
2012-14	4,698	10,449
2015-17	5,665	14,647
2018-20	6,165	17,647

### ***Australian SBT management system***

SBT in Australia has been managed by Statutory Rights since 1984 – the first in Australia. Under this system, there is a fixed number of Statutory Rights in the fishery – and the tonnes/per Right fluctuate with the catch quota in tonnes. In Australia’s case, the quota started at 14,500t. The concept was that the access Rights were secure – and quota changes, market fluctuations and natural disasters were to be managed by trading of quota between the owners of the Rights. In return there, the Rights owners would not ever be granted any government adjustment funds.

The concept has worked. There has been no government assistance at any time – even when the quota was reduced by 70% due to Japan’s illegal catch; when 67% of the in-farm stock died in a storm in 1996; and when market prices have collapsed since 2012.

In each case, the industry adjustment has been through buying quota from those who were not able to continue.

### ***SBT farming***

The global farming concept was developed in Port Lincoln as part of the movement to a high value-added industry after the industry went into official or de facto receivership in the early 1990's. It has been rapidly improved since then due to innovation by the farmers and by scientific research.

Farming catches the SBT live in the GAB at about 18kg average from December to March, tows them in large pontoons to special farming zones around Port Lincoln, then grows out for 3-6 months before harvesting and export.

Farming SBT is possibly the optimum natural resource management – because what it does is relocate the same tuna from a low productivity environment in the wild to a high productivity environment in farms. For example:

	<b>In wild</b>	<b>In farms</b>
Natural mortality pa	20-30%	1%
FCR (kg fed/kg growth)	5.0:1	2.4:1
Growth per year	1.3	2.0

These advantages of farming are extreme in the SBT case because:

- (1) The natural mortality in the wild is so high because of predators, starvation and large migration distances.
- (2) The FCR is high in the wild because of the energy used escaping predators and large migration distances. It is also because farming maximises high seasonal growth periods.
- (3) The large growout pontoons and deep water in farming areas largely replicate the wild environment but without the stress of predators and starvation.

### ***Bait import licence conditions for tuna farms***

These licences are specific to imported bait for tuna farms. The conditions include:

- (1) Each consignment can only be cleared against a specific Import Permit.
- (2) Each consignment must be sealed with the stamp/seal of the Competent Authority and the signatory and role clearly identified,

(3) Each consignment must be accompanied by consignment specific documents issued by the Competent Authority in the exporting country stating:

- a. Identification of fish species in the consignment;
- b. That the fish were wild caught and not grown or harvested in an aquaculture system at any time;
- c. That the consignment does not contain other species;
- d. That the fish were processed in premises approved by and under control of the Competent Authority;
- e. That the fish were inspected under the supervision of the Competent Authority;
- f. That the product is free from visible lesions associated with infectious disease;
- g. During processing the fish were washed and frozen with clean water, using methods approved by the Competent Authority.

(4) Post-entry requirements include:

- a. On arrival the baitfish must be moved under written quarantine direction to a Quarantine approved coldstore;
- b. End-users must be licensed for fishing or aquaculture purposes by the relevant Department of Primary Industries;
- c. A written quarantine direction is required for any movement of the baitfish between Quarantine approved coldstores;
- d. No interstate movement of baitfish is to occur without written permission from the Department;
- e. Coldstores storing and distributing imported finfish must maintain appropriate records to demonstrate full accountability;
- f. The auditing of coldstores storing and distributing imported baitfish will be undertaken at least twice per year.

(5) Special conditions apply to specific species:

- a. DAWR has different condition for specified and non-specified fish, depending on the degree of Biosecurity risk;
- b. Consignments of trawl-caught squid are subject to unpack;
- c. Coldstores storing imported herring (*Clupea Spp*) for use as aquaculture bait are required to ensure that it does not leave the premises between 1 June and 30 November.
- d. Specified species can only be fed in frozen blocks at water temperatures at 15<sup>0</sup>C or above. Below 15<sup>0</sup>C, the blocks must be thawed onshore.

(6) All imports enter Australia under a single tariff item, allowing product to be traced through the system.

