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Commissioner
Australian Marine Fisheries and Aquaculture
Productivity Commission
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9 April March 2016

Dear Commissioner

RE: Submission from the Australian Barramundi Farmers Association (ABFA) - 2016 Productivity Commission Inquiry into the Regulation of Australian Marine Fisheries and Aquaculture Sectors.

The negative impacts on productivity for the Australian farmed barramundi industry arising from inadequate, or overlapping regulatory framework has been identified as a key limiter to industry operations and growth. We understand that the focus of this inquiry is wild harvest, but the ABFA feels that if it does not address the issues facing the aquaculture industry, which is the identified growth sector in the industry, the opportunity to facilitate growth may be delayed for another decade.

By way of background, the ABFA represents members who produce around 6,000t of barramundi annually, valued at \$60M at the farm gate, with operations in all mainland states and the NT utilising a range of production system; land based ponds, sea cages, flow through systems, and recirculation systems. As you would be aware, barramundi is an iconic fish in Australia and is a favourite in the dining sector (approximately 1,500t is produced from wild harvest in Australia and 13,000t is imported). ABFA members have a policy to increase Australian production to 25,000t by 2025, but have identified regulatory issues as one of the major limiters to achieving this growth.

The ABFA is a member of the National Aquaculture Council (NAC) and, as indicated in the NAC submission, we are aware of previous inquiries and reports relating to the regulations applied to Australian aquaculture, and the limited progress that generally has taken place to address those issues.

As with all primary producers in Australia, the industry is facing its fair share of challenges, but due to the ABFA investment in R&D and industry commitment to continual improvement, many of these challenges can be overcome. However, there are a number of key issues that will require government action to address, and when resolved, each will provide significant benefit to industry and the community in the form of increased efficiency, profitability, innovation, employment, food security, regional community sustainability and environmental performance.

The three major challenges relate to food origin labelling, overburdening with regulation, and ensuring that our national and regional biosecurity is not compromised. These are outlined below.

Truth in labelling – aim is to identify origin of seafood so that consumers, including diners, can make informed purchasing decisions

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There is strong support for a legislative means to clearly identify the Country of Origin Labelling (CoOL) of seafood along the whole supply chain - from harvest to the consumer. It is currently in place in all premises that sell seafood (i.e. supermarkets, fish mongers, seafood retailers etc), except for food service outlets (restaurants, café, bistro etc) which are exempt. This means that information on the country of origin of seafood is available all the way to the 'back door' of food service business but then that information is lost to consumers, except in the NT where labelling laws have been in place since 2008.

The ABFA acknowledges that there is a place for imported product, but it should be labelled accordingly so consumers know where it comes from. This is especially the case for iconic species, such as Australian barramundi (*Lates calcarifer*), where currently over 60% of *L. calcarifer* sold in Australia is imported, but most consumers believe they are eating Australian product. Only appropriate labelling will address this.

This matter has been canvassed widely thoroughly through two recent public hearing processes ('2014 Senate Standing Committees on Rural and Regional Affairs and Transport - Current requirements for labelling of seafood and seafood products'; and '2016 Joint Select Committee on Northern Australia - Inquiry into Opportunities for Expanding Aquaculture in Northern Australia'). Both committees arrived at a unanimous and bipartisan recommendation to remove the current exemption to CoOL as applied to the food service sectors. These findings should be adopted.

The ABFA strongly believes that accurate seafood labelling, which provides information about the country of origin of a product, and allows consumers and retailers to make informed choices about buying local or imported products, will achieve the best of both worlds - real market based pricing for local product and access to lower priced imports for millions of consumers.

We can provide additional information on the benefits and impacts of CoOL should that be required by the commission.

Regulation – aim is to protect the environment and encourage a sustainable and profitable industry.

Fish farmers 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 however, stifles innovation, long-term investment, employment, development incentive and profitability.

Across jurisdictions aquaculture legislation is tortuous and covered by too many regulations, administered by low risk Governments. It is extraordinarily difficult to navigate the process, which is handled by too many agencies and authorities. Often these bodies have different objectives, or too narrow a focus, with veto powers, or the capacity to cause substantial and costly delays. The outcome is often a mish-mash of requirements and timelines with associated high and unnecessary compliance costs. A clear and harmonised approach to aquaculture operations and development would increase productivity.

A range of red and green tape, applied at local, state and national levels (often overlapping or conflicting) is generally restricting development of aquaculture in Australia. As an example this is particularly evident in Queensland where the State government has sought to reduce the burden, but a range of Canberra regulatory measures are stifling this change, especially through agencies such as the Great Barrier Reef Marine Park Authority (GBRMPA).

Many current measures are not science based or are applied without recognition of the very low risk that fish farming has on the environment. Peer reviewed research shows that the impacts are generally undetectable, and additional restrictive measures on aquaculture provide negligible and incrementally decreasing environmental benefit, but apply a significant and unnecessary burden on industry.

It will take a change of mindset for the regulators if there is to be any improvement, however staff within many agencies tasked with sustainable resource management, are often ill equipped or not trained to address the issues around increased sustainable aquaculture production, and rather are focussed on implementing overly cautious environmental constraints.

This can be addressed by implementing a science based approach (rather than social media driven public opinion approach) to aquaculture regulation that considers acceptable level of risk (not zero risk) based on species, production system, management practices, site location and the condition of the environment.

Biosecurity aim is to ensure border biosecurity to maintain lifestyle, industry and environment.

One of the greatest threats to Australian food production and social amenity is through the introduction of pests and disease from overseas. Experience shows that once a breach has been made, in most instances it is impossible to control, and the community and industry must live for all time with these pests and diseases.

There are a number of major pest and disease issues in the wild overseas and in their aquaculture production systems that we do not have here in Australia. If we are to remain competitive, continue to produce premium seafood and increase production, we must remain free of these problems.

Biosecurity is something that cannot be compromised on if industry are to be viable into the future. Biosecurity breaches not only impact on farm production, but also jeopardise wild harvest, recreational fishing, Indigenous people's access to the resource for their cultural needs, and the general marine environment and biodiversity.

This can be addressed by increasing the level of biosecurity scrutiny (with the associated legislative framework) on all fresh fish and seafood coming into Australia that could introduce exotic pests and diseases. Although this may lead to increased regulation, the impacts to all resource users, and the broader environment, from a major biosecurity breach would have a significant detrimental impact on the nation's productivity. It should also be noted that there is an inequity in the regulatory compliance burden between Australian produced and imported product.

Please feel free to contact me if you require any further information or clarification.

Yours sincerely.

Executive Officer - Australian Barramundi Farmers Association