

Introduction

This system is very sophisticated and therefore best suited to an environment where seafood undergoes transformation in highly mechanised seafood processing factories primarily aimed at supplying the major retailer supermarkets. Whilst often considered to be best practice in seafood traceability it would not suit the current Australian industry due to the fact the industry here is much less focused on processed and packaged retail products.

(c) the regulations in other jurisdictions, with particular reference to the standards in the European Union (EU) under the common market regulation (EU) No 1379/2013 Article 35;

With regard to these requirements, namely,

- (a) the commercial designation of the species and its scientific name;
- (b) the production method, in particular by the following words "... caught ..." or "... caught in freshwater ..." or "... farmed ...";
- (c) the area where the product was caught or farmed, and the category of fishing gear used in capture of fisheries, as laid down in the first column of Annex III to this Regulation;
- (d) whether the product has been defrosted;
- (e) the date of minimum durability, where appropriate.

The current Australian legislation does not specify this information as being required except for (a) the commercial designation of the species. This is addressed through the FSANZ Food Standards Code and the Australian Fish Names Standard. However, this standard, whilst referenced in the FSANZ Food Standards Code (FSC 4.2.1) is not specifically legislated and hence not being uniformly enforced by the various state and territory food (or fisheries managment) agencies. SFM would like to see the Fish Names Standard legislated to ensure a common naming approach is adopted throughout Australia. Without this the opportunity exists for species confusion which can have either food safety or fisheries management implications.

products in our auction system therefore differentiating
This production method information is available to
our buyers and we support it carrying through to labelling at consumer level. In the longer term,
this should extend to location and jurisdiction (state or commonwealth) as well as identification
of capture in salt, estuarine or fresh water.

 (d) the need for consistent definitions and use of terms in product labelling, including catch area, species names, production method (including gear category), and taking into account Food and Agriculture Organisation guidelines;

Given that current electronic traceability systems are relatively simple and often of a proprietry nature or are paper based processes,

use would become important to ensure that different electronic traceability systems can successfully "talk to each other". These definitions are readily available from the ISO traceability standards and FAO guidance documents.

(e) the need for labelling for cooked or pre-prepared seafood products with reference to the Northern of origin regulation;

SFM supports the principle that consumers are entitled to make an informed choice when making purchasing decisions. Our view is that the introduction of country of origin labelling for seafood sold through restaurants and catering outlets would allow the consumer to make this informed choice with respect to the country of origin provenence of their purchases.

(f) recommendations for the provision of consumer information as determined through the Common Language Group process conducted by the Fisheries Research and Development Corporation;

The Common Language Group is not tasked with providing specific recommendations on the

(h) any related matters.

At the recent IIFET (International Institute of Fisheries Economics and Trade) conference in Brisbane (July 14) it was stated that on a worldwide level seafood is the third most misrepresented food (Petter Olsen from NOFIMA). If this worldwide situation is in any way mirrored in Australia it supports the case for standardised fish naming to be legislated uniformly across the country at every point of sale, and to ensure that this is backed up by targeted surveillance surveys using (when required) either protein or DNA detection methodologies to ensure that any