Label My Fish:
Why Accurate Seafood Labelling Matters

GREENPEACE

Contents

Sustainably caught squid.

Introduction

Australians love seafood. We love the oceans our seafood comes from. But while the average Australian now eats roughly double the amount of seafood we consumed in 1975[1], the amount of fish we can sustainably draw from our oceans for food hasn't kept up.

To put the nearly 370,000 tonnes[2] of seafood we now consume every year on the Australian table, we now eat a greater variety of species, sourced from more locations, and produced using a growing array of methods.

While that has no doubt improved our choices, it has also made them more complex.

Australians want to buy seafood that is good for our health, good for our oceans, and good for the livelihoods of the people who provide it for us.

Some of the seafood we eat is not a healthy choice, does damage to our marine environment, and is produced by people working under unfair conditions.

To make an informed choice, we need to know what fish we're eating, where it came from, and how it was caught or farmed.

Most of the time when we buy seafood we are not given the information we need.

Australia's labelling laws for seafood are inadequate, especially as they apply to restaurants.

The Label My Fish Alliance includes Australian consumers, fishers, chefs, and ocean lovers and are demanding new labelling laws that tell us, whenever we buy seafood:

- **what the species is;**
- **where it was caught; and**
- **the method used to catch or farm it.**

For more information on the Label My Fish campaign visit: www.labelmyfish.com

Our oceans give us life. Every second breath we take comes from the ocean.

Billions of people rely on our oceans for their food and livelihoods.

Image: Sustainably caught seafood.
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What's the problem?

"Not every seafood product on the market is a good choice for consumers. Giving the public more information about what fish they're buying and eating will help our oceans and local fishers."

Pavo Walker, a commercial tuna fisherman from Queensland

Image: Heidi and Pavo Walker, Owners of Walker Seafoods Australia.
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Overfishing, pirate fishing, and destructive and unsustainable fishing methods are some of the main causes of the declining health of our oceans and the collapse of fish populations.

Our magnificent oceans are a source of life and livelihoods for wildlife and people all over the world. The production of seafood is critical to the fabric of numerous Australian coastal communities. Making seafood available to eat is also considered to benefit public health.

While Australian consumption of seafood per person has roughly doubled since 1975 to an estimated total of nearly 370,000 tonnes a year, Australia's domestic production has remained stable for the last two decades.

Due to the low productivity of our marine environment,[3] the prospect of expanding our wild-caught fisheries to provide more seafood to eat is minimal. As a result, Australia is a net importer of seafood, with an estimated 70 per cent of edible seafood now coming from overseas[4].

Seafood products are the most highly traded food commodity around the globe[5].

The way seafood is harvested directly impacts on the oceans and their ability to naturally replenish and be utilised into the future.

Each seafood product we consume differs in terms of how sustainable it is, whether it was produced ethically, and its impact on our health.

No fishery in the world is perfect, but many Australian fisheries, in particular Commonwealth, South Australian and Western Australian fisheries, have strong management relative to some of the neighbours from which we source our seafood. Because those Australian and overseas producers who have invested in fishing sustainably sell on the same market as others they are forced to compete directly, often at an economic disadvantage.

Accurate, comprehensive seafood labelling is fundamental to ensure consumers know exactly what we are buying and eating. It helps to maintain control and understanding of supply chains, protects public health, encourages the sustainable use of fisheries' resources and helps to provide food security into the future.

Australians deserve to be told exactly what seafood they are buying. With proper, clear labelling we are likely to eat a greater variety of fish, favour more sustainable local catch, improve our health, and live in a healthier environment.

What must be disclosed on seafood labels now?

Right now, seafood sellers don't have to tell us very much at all

The current legal requirements for labelling of seafood in Australia stem from a variety of laws at federal and state levels, forming a patchwork of inadequate and confusing legislation and regulations.

Seafood labelling requirements fall into two broad categories: 'country of origin' and 'ingredient identification' labelling.

Seafood labelling where retailers sell unpackaged seafood

Federal laws require that retailers which sell unpackaged seafood, such as in fresh seafood shops, must at minimum state whether the product is local or imported or a mix of the two.

Packaged seafood must be labelled with the so-called 'country of origin', and there are more rigorous requirements for what may be labelled a 'product of Australia'[6].

Unfortunately, 'country of origin' in this case may not refer in any meaningful way to the origin of the seafood ingredients contained in the product. Instead it might refer to the country where the fish was landed or processed, or where most value was added though manufacturing[7].

Seafood labelling in the food service industry

The food service industry, including fish and chip shops, cafes and restaurants, is required to provide even less information to customers.

In all Australian jurisdictions except the Northern Territory, the food service industry is exempt from 'country of origin' labelling. This means, for example, restaurants don't have to write on their menus whether their seafood is Australian or imported.

Northern Territory laws require that imported seafood, prepared for immediate consumption, must be labelled as 'imported' – but the source country is not required.

Seafood labelling of the kinds of fish species on sale

It is not mandatory anywhere in Australia to use consistent fish names where seafood is sold.

The only legal requirement for species labelling is that any identification must be a true representation of the product. It is therefore legal, for example, to label any number of species as 'white fish'. This provides consumers with no useful information because 'white fish' is obviously not a species of fish.

Australia has a Fish Names Standard which is designed to reduce confusion and ensure standard names are used for seafood products. This is referred to in the Australia New Zealand Food Standards Code; however, it is not mandatory to follow the standard.

To add to this inadequacy, parts of the Australian Fish Names Standard are so broad as to be ineffectual. The standard often allows a large number of species to be labelled with the same name, which is inherently misleading.

The public is often in the dark when it comes to choosing what seafood to buy. Without effective labelling we have little way of knowing where our seafood comes from, whether it is sustainable, if the workers who caught it were treated fairly or whether it is good or bad for our health.

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Inadequate seafood labelling laws mean Australians can't make informed choices

Australians currently get information about the sustainability of seafood from a mix of sources and a range of media. Inevitably, these messages sometimes conflict.

For example, approximately 70 per cent of Australian seafood is imported[8].Yet the National Seafood Industry Alliance claims that most Australians think that they are purchasing Australian seafood, when they may well not be[9].

Australians care about the provenance of the seafood they buy and eat.

Industry claims country of origin is second only to freshness in guiding consumer choice yet consumers cannot readily identify where their seafood is sourced[10]. The least the government can do is ensure labelling is accurate and consistent. Values-neutral data that identifies species, origin and production method can and should be provided to consumers to allow them to make informed, independent choices.

"Over time I've come to the conclusion that the only way Australians can make informed choices about what we're eating is if we're given sufficient information, if we're told exactly what's on the plate."

Matthew Evans, chef, former restaurant critic, author and host of SBS's What's the Catch?

What seafood labelling laws exist in Europe?

Half a billion Europeans now benefit from seafood labelling laws, which mean they no longer eat their seafood in the dark.

In the European Union the law requires that all seafood for sale must be identified by signage stating (among other details):

- what species it is;
- where it was caught; and
- the method used to catch or farm it[11].

The EU is the biggest importer of seafood by value, accounting for 24 per cent of all seafood trade globally. EU citizens consumed 12.3 million tonnes, or AUD 74.5 billion worth of seafood, in 2011[12]. Europeans eat a similar amount of seafood per capita to Australians and eat a greater variety of species.

Australians deserve seafood labelling laws like those in the EU

As in Australia, European seafood consumption is heavily reliant on imports[13]. The European seafood market is much larger and more complex than Australia's because of the range of cultural and economic conditions that prevail in EU member states. Australian authorities are fortunate that such a jurisdiction has already implemented good seafood labelling laws which provide a model for how it can be done.

There is therefore no practical impediment in Australia to adopting similar laws to those enjoyed by citizens of the EU.

Why does proper seafood labelling matter?

Over 90 per cent of the world's fisheries are depleted, over-exploited or fished to their limit[14]. And while many fisheries are improving around the world, especially Australian Commonwealth managed fisheries, we still have a long way to go. Sadly, some are actually getting worse.

Labelling protects the environment

Some seafood production can have devastating impacts on the environment. Over the last few decades prawn farming in some countries has been a relentless destroyer of huge expanses of tropical coastlines, particularly mangrove forests. To keep prices low, some farms in Asia have resorted to forced labour and fed their stock on wild-caught so-called 'trash fish'[14], which can include everything from juvenile fish to octopus, crustaceans and small sharks, all caught in indiscriminate nets dragged along the bottom of the ocean, destroying habitat in the process.

Some fisheries, while not causing destruction of habitat, have simply been characterised by mismanagement and overfishing to the point where important species have been brought to the brink of extinction. A classic example is the Southern bluefin tuna fishery, which, due to excessive fishing from countries including Australia and Japan, has been fished to the point where around 95 per cent of that tuna population[16] has been wiped out.

For fishing to be sustainable, populations need to be maintained at such a level that they can continue to be fished productively for an indefinite time. This way we can support both healthy oceans and fishing jobs for the future.

The way fish are harvested should also not put at risk the wider ecosystem by damaging habitat, upsetting the predator prey balance, or killing large numbers of marine animals accidentally as 'bycatch'.

Fortunately, understanding of sustainability is growing in Australia and the demand for sustainable seafood is booming.

Better labelling, marketing and promotion of seafood products could be an important step towards Australian consumers appreciating a greater variety of fish species, such as sardines and mackerel. Broadening our seafood diet would deliver better outcomes for sustainability by taking pressure off more popular species.

By choosing sustainable fish and rejecting seafood caught in a way that harms the ocean, consumers can have a direct and positive impact on the environment.

Labelling protects Australians' health

Eating fish is widely considered to be good for our health.

Governments regularly promote greater seafood consumption and its significant nutritional benefits are one reason for its growing popularity. But there is a health-related imperative for accurate seafood labelling.

Some seafood may do us harm.

Consumption of certain species of seafood, or seafood caught in certain geographic areas, may have negative impacts on particularly susceptible populations, ranging from allergies to serious illness.

Food Standards Australia New Zealand (FSANZ) warns pregnant women and children under six years old to avoid potentially harmful exposure to mercury by limiting their consumption of certain species[17].

Some of the most notable fish for which precaution is counselled are shark, catfish and orange roughy. Shark (sold as flake) and chips is a popular menu item in takeaways in Australia's southern states, basa (catfish) is considered the most widely consumed imported fish in Australia according to the Department of Agriculture[18], and orange roughy is often confusingly labelled.

These species are considered by FSANZ to be such a health risk that it is recommended that all seafood should be avoided for fourteen (shark) and seven days (catfish and orange roughy) after consuming one serve[19].

The other important thing we need to know about the seafood we eat, when determining if there is a risk from potential mercury content, is where it was caught. For example, a recent study found that the mercury content in Patagonian toothfish is markedly higher in those fish caught near Chile than those caught near the South Pole[20].

If Australians, when buying their fish and chips or shopping at their local fresh seafood shop, are not told which species they're eating or which part of the ocean it came from, then they are unable to act on these kinds of health warnings.

Why clear labelling is important

To choose sustainable fish, customers need to be able to differentiate among the seafood products they are looking to buy.

Clear and accurate labelling is vitally important to give consumers the information needed to make an informed, sustainable choice.

Consumers should know:

- **what species we are eating**
  so they can know if it is from a healthy population
- **where the fish was caught**
  so they can select fish from places that have good management, and
- **how the fish was caught or if it was farmed**
  so they can judge the impacts on the wider environment.

Labelling protects Australian fishers and promotes good practices overseas

Australian consumers might assume that they're buying Australian fish most of the time. The reality is they are mainly not.

This misperception allows sellers of imported seafood to benefit from the positive view we hold of Australian seafood, without being subject to the same costs of production that Australian producers endure, and often without having invested in the same degree of good management of their fisheries.

As a result, Australia's seafood labelling laws do not allow domestic seafood producers to compete on an even playing field with imported seafood products.

While Australian fisheries are far from perfect, at the very least Commonwealth fisheries management is of a high standard relative to the standards applicable in the jurisdictions from which much of Australia's seafood is imported.

Not everything imported is a bad choice by any means and better labelling will allow good imports to stand out from the crowd. But some imported products may be subject to very little environmental management and may have been produced under health and labour standards that are rightly considered unacceptable in Australia. These factors may have cost implications, making imports cheaper than local seafood.

With no requirement for accurate labelling, consumers often understandably see local and imported seafood as identical and will choose the imported, cheaper product over Australian seafood without recognising the choice they are really making.

Proper seafood labelling, for species, catch area and fishing method, will allow consumers to choose products from areas where they trust the management and labour standards, reward local and overseas producers known to be fishing sustainably, and support the local fishing industries that bind Australia's coastal communities together.

Increased recognition for sustainable fisheries is also likely to create an incentive to invest in research and development projects.

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Image: Fishing nets
©Greenpeace/Greg Hunt

Case studies: the impact of weak seafood labelling laws on consumers

Research by Greenpeace Australia Pacific shows that poor seafood labelling can confuse and mislead Australian consumers.

Flathead

Flathead is a classic Australian fish to eat. It is popular in fish and chip shops, pubs and restaurants and is widely available in supermarket freezers. For example, major brand Pacific West claims that beer battered flathead is their number one product[21].

But when we buy flathead, what are we getting? Sometimes it is not likely to be actual flathead, unless it is specifically labelled as Australian.

In the Australian Fish Names Standard, 'flathead' is reserved for the Platycephalidae family[22] which is made up of a number of individual species caught commercially and recreationally in Australian waters, including dusky, deepwater and tiger flatheads.

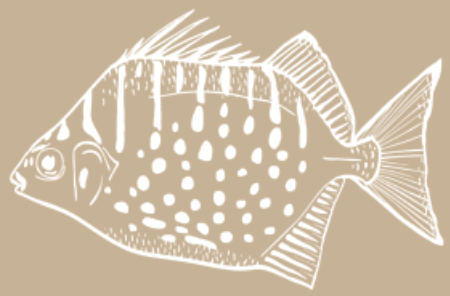
But much of what is actually sold as flathead is an imported South American fish of a completely different family. So-called 'South American Flathead', known in Argentina as 'pez palo' or 'stick fish', is a registered fish name for the species Percophis brasiliensis in Australia[23].

Because the species is not a member of the Platycephalidae family, the Australian Fish Names Standard requires it must not be simply labelled as 'flathead'[24]. However, as we know, Australian law does not require compliance with the use of standard fish names as set out in the Australian Fish Names Standard.

The imported so-called 'flathead' is much cheaper (up to $20 per kilo less) than Australian flathead[25]. This means the cheap flathead at your local pub or fish and chip shop is probably not Australian and probably not what you think of as 'flathead', but there is often no labelling whatsoever to indicate you're not buying Australian flathead, but a very different fish caught by Argentinian bottom trawlers.

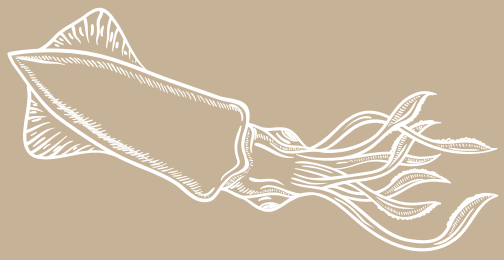
Popular brand I&J also sell the imported fish, with the name 'flathead' emblazoned across the front of the label[26]. A supermarket shopper would have to check the fine print on the back to find that the real species is not what we know in Australia as flathead at all – it is so-called 'South American flathead'.

Even national takeaway chain Red Rooster markets *Percophis brasiliensis* for fish and chips under the title "Flathead fish"[27]. The identity of the fish is only clarified through the ingredients listing: "South American Flathead Fish".



'Butterfish'

Different parts of Australia have different names for the same thing. Australians call 'butterfish' black pomfret, threadfin bream, mulloway, diamondfish, morwong, stargazer, oilfish, escolar and rudderfish depending on where they live. Yet the Australian Fish Names Standard restricts the name 'butterfish' to members of the Scatophagidae family. Other species, including hake, are sold in restaurants as 'butterfish'.



Squid and calamari

There is barely a menu in Australia that does not come graced with crumbed calamari or some variation of salt and pepper squid.

Australian squid and octopus fisheries are generally considered to have healthy stocks, which can be harvested in a way that causes relatively little harm to the environment. But around 80 per cent of the squid and octopus we eat is caught overseas. The product comes from fisheries which are often overfished, subject to inferior fishery management schemes and harvested in a damaging way - squid via trawling and octopus via bottom trawling - leading to bycatch concerns.

Taking a closer look at squid, in the year to June 2012, Australia imported almost 14,500 tonnes of squid and cuttlefish[28] and produced less than 3,000 tonnes domestically[29]. That means that, on average, out of every half dozen calamari rings, only one is Australian.

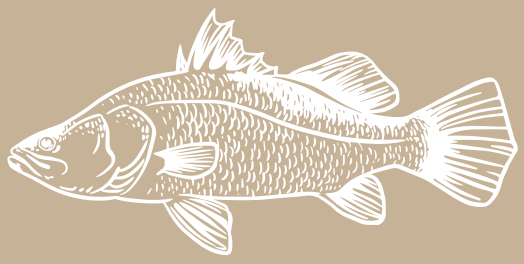
Last year, more than half of the imported squid and cuttlefish came from China (56 per cent), although it may not have been caught there, with New Zealand (13 per cent), Malaysia (11 per cent), and Thailand (7 per cent) also significant sources of squid[30].

Due to the predominant use of trawling and poor management practices in exporting countries, there is evidence of significant negative impacts from squid fishing on the environment, including as a result of bycatch. For example, the New Zealand arrow squid fishery has had a negative impact on the mortality of New Zealand sea lions, which are listed as 'nationally critical' under New Zealand legislation[31].

There are two main squid fisheries in Australia – the fishery for a species called Gould's squid is managed by the Commonwealth and operates outside state waters throughout Australia's south. Smaller coastal fisheries that target southern calamari in South Australia, Tasmania and Victoria are managed by state agencies.

All targeted Australia squid fisheries are considered a 'Better Choice' in Australia's Sustainable Seafood Guide, produced by the Australian Marine Conservation Society (AMCS), as stocks appear to be robust and fished within sustainable limits. Most squid targeted in Australia is also harvested using a relatively low impact fishing method known as jigging[32]. Even squid caught in the Australian trawl sector is subject to management measures that have improved outcomes related to bycatch markedly in recent years.

Anecdotal evidence from industry figures suggests that domestic squid fishers have struggled in recent years to operate economically, in part due to competition from cheaper imported squid, with some squid quota owners giving up fishing entirely.



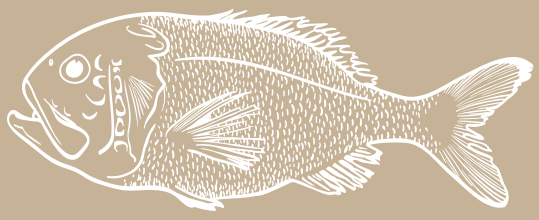
Barramundi

If there is a fish that can outdo the flathead for being considered quintessentially Australian, it is the barramundi. Barramundi – an Aboriginal word meaning 'large-scaled fish' - has a special place on the public plate. In fact, Australians rate the beautiful barra as their favourite fish in restaurants and about 90 per cent of us believe the barramundi they are consuming is Australian, according to research commissioned by the Australian barramundi industry[33]. Yet over two thirds of the barramundi we eat is imported from Asia.

An assessment of barramundi consumption commissioned in 2009 by the Fisheries Research Development Corporation indicates that imports made up 68 per cent of about 7,400 tonnes of barramundi fillets consumed in 2008/9[34]. Lack of data collected by authorities makes it impossible to provide an updated figure for total consumption of imported barramundi, but current figures may reasonably be expected to be similar.

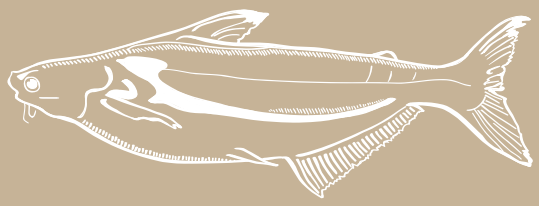
Barramundi is produced in Australia in pond farms on land and sea cages around our coastline, as well as being wild-caught, predominantly in Queensland and the Northern Territory.

AMCS has assessed Australian farmed barramundi as a 'Better Choice" (green ranking) for consumers due to low pollution output from farms and minimal impacts associated with feed used to grown barramundi[35]. AMCS recommend consumers "Eat Less" (amber ranking) of barramundi caught in the Northern Territory or Western Australia, and to avoid Queensland-caught barramundi due to concerns over impacts of fishing on vulnerable marine wildlife, such as sharks and dugongs.The sustainability of farmed barramundi in South East Asia is considered difficult to assess, but heavily reliant on sea cage farming and potentially associated with unsustainable and unethical feed sources, based on typical production methods. Wild caught barramundi from Eastern Indonesia, a major production area, is considered 'high risk' due to significant bycatch of other species[36].



Orange roughy

'Orange roughy' *(Hoplostethus atlanticus)* is very sensitive to overfishing, has been overfished in the past and is currently managed under a conservation program in Australia. As a result, environment groups advise against eating it. Unfortunately 'orange roughy' has a number of long standing names commonly used on restaurant menus, including 'deep sea perch' and 'sea perch'. The lack of one accepted name for the 'orange roughy' species means consumers are left ignorant of the fact they might be eating a fish species now under threat.



Basa

In a clear case of mistaken identity, fillets of catfish, such as basa, have long been sold on the Australian market as 'Pacific dory'.

This labelling is deceptive – basa are not related to the dory family and do not even look like dory. In fact, basa or pangasiidae, are catfish, native to the Mekong Delta where they are wild caught and farmed in vast quantities in Vietnam and other South East Asian countries. The fishery is considered one of the biggest and most important inland fisheries in the world.

The Australian Fish Names Standard requires the name 'basa' to be used for these catfish, yet it is common for restaurants to still use 'Pacific dory'. Under Australia's labelling laws, there is no specific requirement to use the Fish Names Standard so the confusing name is legal.

Another problem is that catfish, which includes basa, are singled out by authorities as potentially risky to health because of mercury content (see page 7).

There are also environmental concerns. Although considered a species well-suited to sustainable farming because it is fast-growing and omnivorous, a significant percentage of the cage farming operations that produce the many thousands of tonnes of catfish for export to Australia each year have a poor record. While considered to be improving, many farms still fail to meet a satisfactory benchmark for effluent management, sustainability of feed supply and labour conditions[37].

The scale of these problems is amplified because of the popularity of basa in Australia. According to research commissioned by the Fisheries Research Development Corporation, it is the most widely eaten imported fish in Australia[38]. Millions of serves of basa are eaten every year, many of which are likely to be potentially labelled simply as 'fish and chips'.

Are claims about the cost of improved seafood labelling accurate?

It is clear from seafood labelling schemes which already exist in the Northern Territory and the EU, that the compliance costs associated with the schemes are minimal.

The UK experience, with similar reforms, suggests that where product traceability processes are already in place – for example in Australia this occurs with frozen or pre-packed imports – adding information such as accurate scientific names for species and gear type information to the product is relatively straightforward and low cost[39].

Some additional costs may be incurred when businesses have to redesign their labels to incorporate new information. However, research suggests[40] that most companies redesign their labels every few years – so allowing for a reasonable transition period will allow business to integrate the changes with a regular brand re-fresh.

For industry sectors, such as the use of fresh fish in the restaurant trade, where established product traceability processes are variable, some investments will need to be made in establishing more robust information exchange. The costs to individual businesses will vary depending on their circumstances and supply chains as some information flow is already in place.

The Restaurant and Catering Industry Association of Australia (RCIAA) recently claimed the cost to the food service sector of implementing simply country of origin labelling alone would be $300 million annually[41]. Chief Executive Officer of the RCIAA, John Hart, gave evidence to the Australian Parliament that the cost each time a menu is updated would be $8,000 to 10,000 per restaurant. This has been presented without justification.

Claims by the RCIAA about the high cost of changing menus to accommodate country of seafood origin or other information have not been supported by any evidence. Anecdotal testimony from restaurateurs suggests that many change their menus regularly, or incorporate seafood on their 'specials' board, making the use of new information a relatively low cost exercise.

Indeed restaurants could further reduce compliance costs by following the lead of the European Union and sharing information about country of origin, gear type and species with their customers through billboards displayed in their premises[42].

Closer to home, a report into the impacts of recent reforms to Northern Territory labelling laws (see page 3) has found the costs to be "not significant"[43]. In fact, this study found that in the Northern Territory following the change to labelling, fishers, seafood retailers and consumers alike are pleased with the results. The report also found that labelling does influence consumer choice, consumers are willing to pay a premium for local produce, and businesses adjusted quickly to the new regulations.

It is clear from seafood labelling schemes which already exist in the Northern Territory and the EU, that the compliance costs associated with the schemes are minimal.

Conclusion

Lax seafood labelling laws in Australia today mean that when people order seafood at their local pub or restaurant they are effectively ordering blind.

The current rules are clearly not fit for purpose, but luckily there is a simple solution.

Seafood labelling laws can be changed to require sellers of seafood to provide three basic pieces of information - what species it is, where it was caught and the method used to catch or farm it.

This simple measure of accurately labelling seafood is long overdue and will bring Australia into line with the European Union.

Consumers will no longer be in the dark about what seafood they are buying and eating.

Australia, girt by sea, can be a world-leader in sustainable seafood production and consumption, and this simple step will take us closer to that goal.

It is rare in public policy that something is this simple. Improved seafood labelling is better for Australian fishers and promotes good practice overseas. It is better for our health. And it is better for our oceans.

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