



17 January 2023

Country of Origin Labelling Team
Department of Industry, Science, Resources
originlabelling@industry.gov.au

Dear Sir/Madam,

Country of origin labelling for seafood – response to discussion paper

Thank you for the opportunity to respond to the Australian Government's proposal to implement mandatory country of origin labelling for seafood. The AHA notes:

- Its support for Australian primary industries such as the seafood industry
- But continues to express its concern at the cost and red tape mandatory seafood labelling will impose upon small businesses, noting further that 65% of hotels are family owned

The AHA notes further that:

- Consumers have the opportunity to enquire with wait-staff about the origins of their food. Where staff are unable to provide an answer, there are usually other food choices available.
- There are varying degrees of inquiry depending on the type of food service business, e.g., there are more inquiries regarding food origin at a five-star restaurant than at an outback hotel – and largely the market is meeting the demand for more information where it exists.
- At a time when there is a strong need for productivity and wage growth, adding more red tape will add time and cost to businesses who already struggle with a range of other compliance costs.
- This will also open the door for a whole range of other red tape food origin measures that might be imposed, e.g., barn laid versus cage laid eggs, grass fed versus grain fed beef.

However, given the Governments clear intention to mandate country of origin labelling for seafood, the AHA supports the following key principles as set out in the discussion paper:

- The changes should apply to all food service businesses that sell seafood for immediate or imminent consumption, including fast food and takeaway
- Businesses can use abbreviations such as (A) for Australian, (I) for International, and (M) for mixed origin
- Clear guidance materials should be made available for businesses and patrons
- Labelling not being required for seafood ingredients or by products
- Businesses be supported in a transition period and enforcement action not being taken during the transition period

The AHA would appreciate working with you further on the practical implementation of this policy.

Yours faithfully

STEPHEN FERGUSON
AHA NATIONAL CEO