

26 October 2012

Mr David Borthwick  
C/O Gordon Neil  
General Manager  
Sustainable Resource Management Fisheries  
Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
CANBERRA ACT 2601

By email: [fisheries.review@daff.gov.au](mailto:fisheries.review@daff.gov.au)

Dear David,

### **Review of Commonwealth Fisheries Management Legislation**

Coles welcomes the opportunity to comment on the *Review of Commonwealth Fisheries Management Legislation*.

Coles is a national retailer that operates more than 740 supermarkets across all States and Territories of Australia. We sell an extensive range of seafood and seafood products in our stores with the majority of our fresh seafood currently being sourced from Australia.

Our customers tell us that the health of our oceans is important to them and that responsible and sustainable sourcing is important to reinforce the quality and freshness of the seafood we sell. We believe this provides a great opportunity for all participants in the seafood industry to fulfil this growing demand sustainably. As such, we are interested in the management and regulation of the seafood we sell that is sourced from Australia.

Coles provides the following comments for your consideration as outlined in the context, objectives and scope of the review.

#### **1. Ecologically Sustainable Seafood**

Coles is responding to the increased customer demand for fresh, Australian, responsibly and sustainably sourced seafood. For example, in March 2011 we formed a partnership with WWF-Australia (WWF) to enable us to provide this offer to our customers. WWF are reviewing the ecological sustainability of all the seafood we sell from both Australian and imported sources using comprehensive scientific information about species, fishery, ecosystem and management from publically available databases. WWF also provide us with expert technical advice using the outcomes of the review to improve the sustainability of our seafood offer.

As such, Coles supports fisheries legislation that helps participants in the seafood industry fulfil consumer demand while maintaining a sustainable industry into the future. We believe that changes in legislation should deliver a system that is responsive in a timely manner, to changing community attitudes about the marine environment.

Coles believes that Australian fisheries legislation must deliver ecological sustainability outcomes in the fullest sense by following the principles of sustainable sourcing (1) knowledge; (2) stock status; (3) interactions and (4) management including the concept of fisheries improvement projects. In the ecological assessments that have been completed for us to date, it has been challenging on occasions to obtain sufficient robust data that demonstrates some fisheries are being operated responsibly. The ecological sustainability of Australian fisheries is not particularly obvious and should be addressed as part of the review.

## 2. International Seafood Sustainability Standards

Coles supports alignment of legislation to credible internationally recognised independent third party sustainability standards such as the Marine Stewardship Council (MSC) and Aquaculture Stewardship Council (ASC) standards. Independent third party standards and accompanying accreditation and certification schemes, such as MSC and ASC, are an effective means for retailers and manufacturers to convey to our customers that the seafood they purchase is sustainably and responsibly sourced.

Coles supports legislation that facilitates a straight forward transition for fisheries and industry sectors wishing to meet consumer's environmental expectations by moving towards accreditation to MSC and ASC Standards.

Coles is encouraged by the initiatives taken by some Australian Governments and industry sectors to move towards sustainable fisheries. For example, the recent Western Australian Government decision to gain Marine Stewardship Council (MSC) certification for the commercial fisheries they manage. Another recent example is the achievement of MSC certification by the Australian Northern Prawn Fisheries.

In relation to the interaction of the Australian Fisheries Management Authority (AFMA) and the Commonwealth environmental legislation (the *Environment Protection and Biodiversity Conservation Act 1999*), we support a recognition of the MSC and ASC standards under the Wildlife Trade Order (WTO) provisions. Furthermore, in line with delivering on our customer's expectation for responsibly harvested seafood, we support robust implementation of WTO provisions including enforcement of prescribed recommendations and conditions, with better coordination between Government departments regarding roles to ensure efficiencies in regulating responsible production.

In summary, Coles supports fisheries legislation that enables retailers to fulfil consumer demand in a manner that ensures a sustainable industry into the future.

Thank you again for the opportunity to comment on the Review of Commonwealth Fisheries Management Legislation. Should you wish to further discuss our submission please contact \_\_\_\_\_ on \_\_\_\_\_ or via email \_\_\_\_\_

Yours sincerely

**Jackie Healing**  
Head of Quality & Responsible Sourcing  
Coles Supermarkets Limited