POLICY ARTICLE

Sustainable Imported Seafood and Aquaculture Feed Transparency

Policy purpose, labelling reform, feed traceability and retail accountability

Policy purpose

Australia should ensure that seafood sold to Australian consumers is not contributing to the destruction of marine ecosystems through destructive fishing practices used to produce aquaculture feed.

The policy would establish stronger transparency, traceability and procurement requirements for imported farmed seafood, particularly prawns and other feed-dependent aquaculture products, while improving country-of-origin and production-method labelling for cooked and retail seafood.

The central principle is simple:

If an imported seafood product depends on wild marine resources for feed, consumers should be able to know where those resources came from and whether their harvesting contributed to ecological depletion.

Policy objectives

The policy would:

1. Reduce Australian market support for destructive trawl fisheries used to supply fishmeal and fish oil.
2. Improve transparency in imported aquaculture supply chains.
3. Require meaningful labelling beyond the broad term “Imported”.
4. Give consumers enough information to make informed environmental choices.
5. Reward aquaculture producers using processing by-products, responsibly managed fisheries and lower-impact feed systems.
6. Place responsibility on major retailers and importers to verify seafood supply chains rather than leaving consumers to investigate them.
7. Reduce the risk that Australian seafood demand contributes to the depletion of Thailand’s marine fisheries and similar ecosystems elsewhere.
8. Encourage long-term sustainability of aquaculture industries by reducing dependence on declining wild fish resources.

Scope

The policy should apply to:

- Imported farmed prawns.
- Imported farmed fish species that rely materially on fishmeal or fish oil.
- Seafood sold through supermarkets.
- Seafood sold through restaurants, cafes, hotels, clubs and takeaway businesses.
- Cooked seafood counters.
- Frozen seafood.
- Pre-packaged seafood.
- Seafood ingredients used in prepared foods where seafood is a major component.
- Major seafood importers and wholesalers.
- Australian retailers purchasing imported farmed seafood under private-label arrangements.

Mandatory seafood labelling reform

Current labelling that identifies seafood simply as Australian, Imported or Mixed should be expanded for seafood where production method and feed origin are material to environmental impact.

For farmed seafood, mandatory labelling should include:

- Country of farming.
- Species.
- Farmed or wild-caught status.
- Country of final processing where different from country of farming.
- Whether marine fishmeal or fish oil was used in the production feed.

Where marine ingredients are used, suppliers should also disclose whether they were derived primarily from:

- Processing by-products.
- Whole wild-caught fish.
- A mixture of both.

Where whole wild-caught fish are used, the label or linked product information should identify whether those fisheries are independently assessed as sustainably managed.

Cooked seafood labelling

Cooked seafood must not be allowed to disappear behind vague labelling.

Restaurants, takeaway businesses, supermarkets and seafood counters should identify the actual country of origin where it is reasonably available.

Instead of “Imported prawns”, consumers should see “Farmed vannamei prawns — Thailand” or “Farmed prawns — Vietnam”.

This should apply equally whether the seafood is:

- Fresh.
- Frozen.
- Cooked.
- Peeled.
- Marinated.
- Included in seafood platters.
- Sold from deli counters.
- Served in hospitality venues.

Aquaculture feed traceability standard

Importers of farmed prawns and other designated aquaculture products should be required to maintain documented traceability for the marine ingredients used in feed.

The traceability record should include:

- Feed manufacturer.
- Feed mill location.
- Major feed ingredients.
- Percentage of fishmeal and fish oil used.
- Percentage derived from seafood-processing by-products.
- Percentage derived from whole wild-caught fish.
- Country and fishery of origin for whole-fish marine ingredients.
- Certification or sustainability assessment applying to those fisheries.
- Any use of mixed low-value or trash-fish catches.
- Any use of fish sourced from bottom or demersal trawl fisheries.

This information should be available to regulators and major retail purchasers and summarised for consumers.

Prohibition on high-risk feed sources

Australia should prohibit or progressively restrict imported farmed seafood where feed contains marine ingredients sourced from fisheries that cannot demonstrate basic sustainability and traceability.

Particular scrutiny should apply where fishmeal or fish oil originates from:

- Unassessed trawl fisheries.
- Fisheries with severe historical biomass depletion.
- Fisheries with high juvenile fish capture.
- Mixed “trash fish” catches with poor species identification.
- Illegal, unreported or unregulated fishing.

- Fisheries unable to identify the vessel, landing port or source fishery.
- Supply chains where fishmeal producers cannot distinguish processing waste from whole wild-caught fish.

This should not amount to a blanket ban on Thai seafood. It should distinguish responsible Thai producers from supply chains that continue to depend on destructive fishing.

Retailer due-diligence obligations

Major supermarkets and large seafood retailers should have a positive duty to investigate the environmental footprint of imported farmed seafood.

Coles, Woolworths and other major retailers should not be able to satisfy that obligation merely by obtaining a generic sustainability certificate.

They should be required to know:

- Where the seafood was farmed.
- Who supplied the feed.
- Whether the feed contained marine ingredients.
- Where those marine ingredients originated.
- Whether whole wild fish were used.
- Whether those fisheries were sustainably managed.
- Whether destructive trawling materially contributed to the feed supply.

Retailers should retain supply-chain documentation for regulatory inspection.

Public seafood transparency register

The Commonwealth should establish a publicly searchable Imported Seafood Transparency Register.

For major imported aquaculture products, the register should identify:

- Retailer or importer.
- Product.
- Species.
- Country of farming.
- Processing country.
- Feed supplier where applicable.
- Marine ingredient use.
- Percentage of processing by-product use.
- Use of whole wild-caught fish.
- Applicable sustainability certification.
- Any identified high-risk feed source.
- Any compliance action taken.

Consumers should be able to scan a QR code on the product and access this information.

Thailand and other high-risk fisheries

The policy should establish a risk-based assessment system for source countries and fisheries.

Thailand should not be singled out politically. However, where historical and current evidence demonstrates substantial stock depletion, high trawl pressure, juvenile fish capture or dependence on low-value fish for fishmeal production, those supply chains should receive enhanced scrutiny.

The same rules should apply to any country. The issue is the fishing method and ecological impact, not nationality.

Reducing dependence on whole wild fish

Australian seafood procurement standards should favour aquaculture feed that increasingly uses:

- Seafood-processing by-products.
- Trimmings from fish already harvested for human consumption.
- Verified sustainable forage fisheries.
- Non-marine protein sources where nutritionally appropriate.
- Novel proteins.
- Algae-derived omega-3 ingredients.
- Fermentation-derived ingredients.
- Other demonstrably lower-impact feed technologies.

The policy should not require elimination of marine ingredients where they remain nutritionally necessary. It should require that those ingredients come from responsible sources.

Government procurement

Commonwealth government departments, defence facilities, hospitals, aged-care facilities, prisons and publicly funded institutions should procure imported farmed seafood only where the supplier can demonstrate compliance with the feed-traceability requirements.

Government should not spend taxpayer money purchasing seafood produced through environmentally destructive or untraceable feed chains.

Independent auditing

Importers and major retailers should be subject to periodic independent audits.

Audits should test:

- Feed documentation.
- Supplier declarations.
- Fishmeal origin.
- Certification validity.
- Chain of custody.
- Species composition records where applicable.
- Evidence of processing by-product sourcing.
- Any claimed exclusion of whole wild-caught fish.

False sustainability claims should attract serious penalties.

Penalties

Penalties should apply where an importer, supplier or retailer:

- Provides false feed-origin information.
- Misrepresents sustainability certification.
- Fails to maintain traceability records.
- Labels imported seafood incorrectly.
- Conceals the use of prohibited high-risk marine ingredients.
- Fails to disclose known feed sourcing risks.

Repeated or deliberate breaches should attract significantly higher penalties than administrative mistakes.

Transition period

The policy should be introduced in stages.

First 12 months

- Mandatory country, species and farmed/wild disclosure.
- Importer reporting requirements.
- Creation of the seafood transparency register.

12 to 24 months

- Mandatory aquaculture feed-origin disclosure.
- Retailer due-diligence obligations.
- Independent auditing requirements.

After 24 months

- Restrictions on seafood produced using high-risk or untraceable whole-fish marine ingredients.
- Mandatory consumer-facing feed information for designated imported aquaculture products.

Support for responsible producers

The policy should deliberately reward producers that improve their environmental performance.

Products should be eligible for a recognised Australian low-impact aquaculture label where they demonstrate:

- Full feed traceability.
- Predominant use of processing by-products where marine ingredients are required.
- No identified illegal or unreported fishing.
- No destructive unassessed trash-fish sourcing.
- Independent environmental certification.
- Transparent supply-chain reporting.

This gives responsible Thai producers and other international suppliers a commercial advantage rather than punishing an entire national industry.

Why this policy is necessary

Thailand's marine fisheries provide a warning about what happens when fishing pressure exceeds ecological replacement.

Historic Gulf of Thailand trawl catch rates fell from close to 300 kilograms per trawling hour in the early 1960s to roughly 20–30 kilograms per hour in later decades.

Research has also documented large proportions of juvenile commercially valuable fish within low-value and trash-fish catches.

At the same time, the aquaculture and fishmeal industries have increasingly relied on processing by-products, imported marine ingredients and alternative feed sources.

These developments indicate a system already under pressure.

Australia should not wait until source fisheries collapse before asking where aquaculture feed comes from.

Core reform

The core reform is straightforward:

No imported farmed seafood should enter the Australian market without meaningful traceability of the marine resources used to produce it.

Country-of-origin labelling is useful. Feed-origin transparency is the next logical step.

Australians should be able to choose prawns without unknowingly supporting the destruction of juvenile fish populations, heavily depleted trawl fisheries or marine ecosystems being converted into animal feed.

That is not excessive regulation. It is basic supply-chain accountability.

Sources and references

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- Australian Government Department of Industry, Science and Resources — Country-of-origin labelling requirements for seafood in hospitality settings.
- Australian Department of Agriculture, Fisheries and Forestry — Australian prawn production, imports and biosecurity.
- Coles Group — Responsible seafood sourcing program and seafood supply-chain environmental risks.
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- Aquaculture Stewardship Council — ASC Feed Standard and requirements relating to marine ingredient sourcing.