



SYDNEY FISH MARKET PTY LTD

SUBMISSION

TO

QUARANTINE AND BIOSECURITY REVIEW - APRIL 2008

Sydney Fish Market Pty Ltd (SFM) is the largest seafood auction in the Southern Hemisphere. The Market operates from its facilities in Pyrmont NSW supplying fresh chilled seafood and live crustaceans into the Sydney market and regional areas such as Canberra, the Western Ranges, and the Hunter region. The Auction sells approximately 13,000 tonnes of product per annum.

To meet the growing demand for seafood consumption in Sydney, SFM has, since the early 1990's, sourced product from overseas to fill gaps in certain sought-after species. Although a large percentage of this is satisfied by imports from New Zealand, the growing trend over the last three years is to look elsewhere in countries such as Indonesia and the South Pacific. SFM's and other importers' dependence on these and other regions will continue to grow as Australian wild-caught product becomes increasingly more difficult to access.

SFM currently imports approximately 1,000 tonnes of fresh, chilled seafood per annum, primarily finfish.

Unlike the vast majority of importers, SFM does not import frozen product. Thus the basis of this submission will be focussed on the time critical nature of the perishability of fresh, chilled seafood.

The following points are areas of concern to SFM when dealing with Quarantine and Biosecurity:

1. SFM acknowledges the seafood it intends to import into Australia must be included on an Import Permit for the country of origin. However, despite our best efforts in reminding overseas suppliers to only export those products listed on the SFM Import Permit, occasionally shipments will contain product not recorded against the Permit. SFM believes such non-recorded product should not unnecessarily delay the clearance of the entire shipment as SFM has previously experienced. SFM agrees that the non-recorded product should be quarantined from the rest of the shipment until an application for inclusion of these products is completed. However, the balance of the shipment should be released without delay.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET PYRMONT NSW 2009
LOCKED BAG 247 PYRMONT NSW 2009
TEL 02 9004 1100 FAX 02 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU
WWW.SFMLIVE.COM

2. Applications to amend import permits are subject to a ten day approval period. A delay of this nature is almost always detrimental to the saleability of fresh chilled seafood. Alternative arrangements need to be considered particularly when, in SFM's experience, some unrecorded species are eventually deemed non-risk or non-specific finfish and do not require inclusion on the import permit:
3. Currently "high risk" species are subject to regular inspection and sample testing by AQIS Officers. Importers who satisfy the initial five shipment surveillance and have not received any "failed" results are then placed on a 1 in 20 shipments inspection cycle. The problem with this requirement is the 1 in 20 inspection does not apply only to the individual importer but, rather, AQIS deem each "high risk" species as a single commodity applicable to all importers of such products. What this means is operators who import certain "high risk" species more regularly than others are very likely to be subject to an increase in the ratio of testing than those who import the same species less frequently. In SFM's case, we have experienced, on average, one inspection in five shipments over the past six months. Further, in every case each item tested returned a "pass" status. SFM believes this requirement is inequitable and unfairly applied and recommends consideration be given to applying the 1 in 20 cycle against each individual importer.
4. Random inspections are called from time to time on species not regarded as "high risk". In such cases, samples are often taken for laboratory analysis. In recent times SFM has noted an increase in the number of species being tested for heavy metals and chemical contamination not regarded by the seafood industry as relevant or applicable to the species sampled. For example, Mercury in Octopus and Histamine in wild-caught Barramundi. SFM recommends a review of the laboratory analysis component for sample testing to brought more in line with typical industry standards for the testing of seafood.
5. Most seafood operators who trade in wholesale chilled seafood commence operations very early in the morning. For many, the majority of their trade is conducted and completed before the commencement of many traditional "9 to 5" operations. At SFM, the auction commences at 5:30am Monday to Friday (excluding public holidays) and is normally finished by 8:30am. This means product is sold on the day it arrives for auction. Imported product subject to IFIP inspection cannot be sold until after the work has been completed by the IFIP Officer. Although SFM makes prior arrangements for an IFIP Officer to be present early to conduct his inspection and enable the sale of the product on the same morning, rarely is the inspection commenced on time, thus resulting in product being held over to the next auction day. When this occurs on the last trading day of the week sale of the product may be delayed by three days, or even longer if there is a public holiday before the next auction day.

SFM believes the only solution is either for the IFIP inspection to be conducted on the product at the Airport on the day of arrival or for the IFIP Officers to make themselves available much earlier in the morning at the importer's premises, eg: no later than 6:00am. Currently, the only people who suffer when these delays occur are the suppliers of the fish, the importers of the product and the retailers who have lost an additional shelf-life day in which to move the product.

6. To minimise delays in collecting imported product from Sydney Airport, SFM, through its clearing agent (Qantas Clearing), pre-clears shipments for collection on the day of arrival into Sydney. To achieve this, all shipping documents must be presented to the AQIS office before 4:00pm weekdays. Although every attempt is made to have these documents received from suppliers as soon as they become available from the port of embarkation, often the receipt of such documents leaves very little time to meet the 4:00pm cut off at AQIS office. The problem is made worse if any product is subject to either quarantine or IPIP inspection. Given the highly perishable nature of chilled seafood products, consideration should be given to extending AQIS operational hours to minimise delays in clearances and, where necessary, making arrangements for Quarantine and/or IFIP appointments. The fallout if the above is not achieved before 4:00pm is an extra day lost in shelf life of the affected product.
7. The naming of seafood sold in Australia has been subject to a review process by an industry body, the Fish Names Committee (FNC) since 2001. In October 2007, the process and list of fish names were formally ratified by Standards Australia. Prior to this date, SFM had adopted the recommendations of the FNC and rolled out the Standard Fish Names through its systems in May 2005. The purpose of raising this point is that, to date, AQIS Imports and Exports have not yet incorporated into their systems this critical change to the marketing names of fish (established to eliminate any confusion with the name and type of fish sold) whether it was locally caught, produced or imported. SFM strongly urges this Review to consider the official Australian Standard Fish Names List and incorporate it into their systems as a matter of urgency.

Thank you for the opportunity to submit SFM's issues and suggested improvements to Quarantine and Biosecurity Review April 2008.

If there are any aspects of this Submission that require clarification, please do not hesitate to contact SFM as detailed in the Submission Coversheet.