

Garcia Garcia, S., Barclay, K., & Nicholls, R. (2020). The multiple meanings of fish: policy disconnections in Australian seafood governance. In E. Probyn, K. Johnston, & N. Lee (Eds.), *Sustaining Seas. Oceanic Space and the Politics of Care*. Lanham, MD: Rowman & Littlefield Publishers

Chapter 5

The multiple meanings of fish: Policy disconnections in Australian seafood governance

In Australia, fisheries management jurisdictions at the state and federal level regulate fisheries according to sustainability objectives contained in legislation and related formal regulatory measures such as harvest strategies and management plans. The current system for governing fisheries was shaped in the 1990s against the backdrop of concerns about dramatically overfished stocks such as gemfish and orange roughy, which increased public awareness of environmental issues and employment-reducing restructuring of major commercial fisheries. Contemporary fisheries management objectives thus came to be focused on sustainability. In this vision of sustainability, fish are imagined as biological stocks and the amounts of fish of particular species is the key indicator regarding availability of the resource for current and future generations. Economic objectives are narrowly considered and social aspects of sustainability are not—fish are not treated as sources of food, culture, or livelihoods. Once fish enter the postharvest supply chain, the policy imaginary changes and they are regulated as a food commodity. In this space, governors for consumer protection manage products to ensure they are safe to eat and set the conditions for sale, including what information needs to be available to consumers. Seafood supply is guaranteed through trade flows, so sustainability is not regulated in the postharvest part of the supply chain. Sustainability is treated as a consumer value to be left to the initiative of the private sector, for example, through branding seafood product with ecolabels.

This chapter addresses the effects of this disconnection between the meanings of fish as a natural resource and fish as food, between the goals of the governors in the harvest and in the postharvest space. We have analyzed qualitative data—policy documents, interviews, and event observations—for insights into the consequences of this policy disconnect, as well as possible tools to address it. The chapter begins by exploring the main features of the present regulatory environment. First, the regulatory burdens of fisheries management—the costs of regulation imposed on those subjected to compliance with it—are different for domestically caught seafood and for the imported seafood that sits beside it on the

supermarket shelf or menu. This creates a risk that the final point-of-sale business may choose to attribute an incorrect place of origin if the expected compliance risk is outweighed by the margin improvement flowing from misleading labeling. Second, the available voluntary tools for labeling seafood as having been sustainably harvested, such as Marine Stewardship Council (MSC) certification, are targeted to high-value, economically efficient fisheries. MSC certification is too expensive for the small-scale operators that constitute a large part of the Australian fishing sector. Finally, a history of conflict between Australian professional and recreational fishers and the conservation movement has damaged public perceptions of professional fisheries. This has been compounded by a lack of effective public communication about the relatively strong management of commercial fishing by Australian governments since the 1990s, leading to the situation in which the fishing industry fears the loss of public trust in their activity. These three situations arise from inaction by government on fisheries sustainability after the seafood is harvested to enable a level playing field for sustainable produce. The absence of this level playing field risks advantaging imports over domestic seafood, and product from unregulated fisheries over sustainably caught fish.

An attempt has been made to address this policy disconnect through country-of-origin labeling, based on the assumption that, because Australian fisheries are fairly well regulated, this would act as a proxy for sustainability requirements in the retail sphere. Another possible way to address the disconnect is through requiring importers to demonstrate that their seafood shipments were legally caught. Regulatory bodies in the European Union and the United States have addressed possibly unfair market competition between imported seafood, which may not have been produced under stringent fisheries management, and domestically produced seafood that has been subject to such management through requiring traceability documentation to demonstrate the fish comes from a regulated fishery.

Governing Fish, Governing Seafood

In the first half of the twentieth century, the main goal of fisheries management in Australia was the development of fisheries as an economic sector, driven by state and federal governments to maximize the opportunity offered by apparently large stocks along the Australian coast (Clark 2017, 101). Rapid development of commercial fisheries from the 1950s led to plummeting stocks of southern bluefin tuna and gemfish in the 1980s, and orange roughy in the early 1990s (Clark 2017, 106–108). These fishery collapses occurred against a background of increased scrutiny from environmental groups and conflict for resource access with the recreational fishing sector. In Australia, recreational fishing groups

have successfully lobbied to have professional fishing excluded from certain waterways and continue to push for further restrictions on professional fishing (King and O’Meara 2018). These conflicts over resource access—episodes of collapsed fisheries and media coverage of overfishing as a global problem—have damaged the public image of professional fishing and brought about a profound revision of government regulatory objectives. Regulation has shifted from industry expansion to the pursuit of biological sustainability through the monitoring of stocks, restricting entrants and preventing overfishing:

Fish are a renewable, but not inexhaustible, resource. They are subject to the well-recognized potential for a “tragedy of the commons,” where the unregulated efforts of individual fishers deplete the resource. Governments must therefore limit catches to sustainably manage resources and, where there is competition between fishers, determine how access is to be shared. (Productivity Commission 2016, 3)

This focus on sustainability crystallized in the adoption of Ecologically Sustainable Development (ESD) principles; the definition and core objectives of ESD for Australia are contained in the *National Strategy for Ecologically Sustainable Development* endorsed by the Council of Australian Governments in 1992, integrated in the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) and in the different Fisheries Acts of the states. The three components of sustainability—social, economic, and environmental—were taken into account in the high-level objectives of the legislation. However, the primary effect of the legislation addressed the biological component of sustainability, complemented in some cases by economic objectives (Barclay 2012). The operational objectives in management plans and harvest strategies rely strongly on the conception of fish as a stock whose existence in sufficient numbers is the fundamental goal of fisheries management:

The Status of Australian Fish Stock Reports are a series of assessments of the biological sustainability of a broad range of wild-caught fish stocks against a nationally agreed framework. The reports examine whether the abundance of fish and the level of harvest from the stock are sustainable.

The 2018 reports focus solely on the status of fish stocks. The status classifications do not consider broader ecosystem impacts of fishing or social and economic considerations that some consumers may be interested in.

(Fisheries Research and Development Corporation [FRDC] 2018a, paras 1, 9)

The economic component of ESD is present in some fisheries legislation, such as the aim to maximize the “net economic returns to the Australian community” (Commonwealth of Australia 1991, 2) of the harvest. Economic measurements of the value of Australian fisheries remain unsophisticated (Pascoe et al. 2016) and are undefined in many jurisdictions. Governments have not clearly articulated who should benefit from the exploitation of fishery resources: “Is the objective of the fishery to provide employment, food, reward entrepreneurship, generate income for the community, provide recreational utility or some other goal?” (Emery et al. 2017, 143). The vagueness of economic objectives, coupled with the disregard for the social component of sustainability (Barclay 2012, 38) means that fish stocks are managed to be available for future generations, but beyond that the goals are unclear.

The governance arrangements oriented to maintain fish stocks cease once the fish leaves the wharf and enters the supply chain as seafood. In the postharvest space, seafood is categorized as a food product, and governance arrangements aim at ensuring market competition and that food is safe to eat. This affects both imports and domestic product. Imports are subject to border controls for food safety and biosecurity but not to the demonstration of sustainability, in line with a trade regime in which the former constitute an acceptable trade barrier but environmental provisions have been traditionally problematic. Apart from the border control of biosecurity, the main regulatory responsibilities for seafood in the postharvest space are transferred to food authorities and consumer protection frameworks. In these frameworks, the government’s ESD objectives are not pursued in the legislation or policies of the food safety and consumer protection authorities. In this framework, food safety is the object of mandatory information, followed by preventative health. Other consumer values issues, including environmental values, are left up to industry-initiated regulation.

Regulatory action in relation to food safety, preventative health and new technologies should primarily be initiated by government and referenced in the Food Standards Code. Regulatory action in relation to consumer values issues should generally be initiated by industry and referenced to consumer protection legislation. (Blewett et al. 2011, 48)

The private sector thus emerges as a governor to fill the regulatory gap regarding sustainability, that is, to certify the sustainability of the seafood in the marketplace and to

communicate this attribute to consumers. Internationally, some companies along supply chains use a variety of certification programs and associated marketing tools provided by independent organizations to demonstrate sustainability claims and differentiate their product to consumers (Auld 2014, 1). Such programs have contributed to the environmental regulation of fisheries and constitute one of the prime examples of global nonstate regulatory mechanisms (Hatanaka, Bain and Busch 2005, 355). Some Australian fisheries have been active in seeking certification. In March 2000, the Western Rock Lobster Fishery was the first fishery in the world to become MSC certified and, in 2017, the first to have been recertified for a fourth time (MSC 2018). In 2012, the Northern Prawn Fishery was the first tropical prawn fishery in the world to be MSC certified, achieving one of the best MSC scores ever (Hadjimichael and Hegland 2016, 131). Western Australia is also the site of a collaboration between MSC and the state government to enable simultaneous preassessment of different fisheries by regions (Bellchambers et al. 2016). However, certifications cover a fraction of the seafood sold in Australia. This partial coverage of sustainability concerns in the postharvest space through private sector tools fails to solve the regulatory gap and has a number of effects.

The Effects of Policy Disconnections

The absence of government regulation for sustainable fisheries in the postharvest space has a number of implications. It produces a regulatory gap in that Australian fisheries are regulated for sustainability whereas imports are not subject to the demonstration of sustainability. The different sustainability requirements for domestic and imported seafood may result in a price advantage for less sustainably sourced seafood, thus reducing economic opportunities of fisheries subject to regulatory measures, whether domestic or foreign. The regulatory gap is especially relevant in a market characterized by a strong dependency on imports—in 2015–2016, imports made up 67 percent of the total consumption of seafood in Australia (Hogan 2017, 34).

The imbalance in the regulatory requirements is exacerbated by the partial success of private governance in the certification and communication of sustainability credentials. Certification of the sustainability of seafood remains restricted to the large-scale, industrialized, economically efficient fisheries and large supply chain actors. This presents a problem for the small, family-owned fishing businesses that make up the majority of Australian fisheries (FRDC and Ridge Partners 2015, 71). As an interviewee pointed out, “The problem for Australia for going into the market and demonstrating sustainability is that

you've got the haves and have nots" (research funder, pers. comm., November 14, 2017). The have nots—those domestic fisheries subject to strong fisheries regulation but unable to demonstrate their sustainability credentials in the marketplace—thus compete in the retail space without the capacity to use voluntary tools to communicate their sustainability credentials. This means they compete directly with less regulated fisheries with lower regulatory costs. The result is a price disadvantage for seafood from more sustainable fisheries.

Another problem arising from lack of government involvement on sustainability outside the regulation of fisheries per se is that governments have not effectively communicated to the public that most Australian fisheries have since the 1990s been well managed in terms of preventing overfishing. The damage of the public image of professional fishing brought about by the collapse of fisheries in the 1980s and 1990s, plus ongoing media coverage of overfishing as a global problem has led to a low degree of trust in both government and the fishing industry well documented in studies (Mazur, Curtis, and Bodsworth 2014, 12). The failure to communicate to the public that Australian fisheries are by and large sustainably managed has contributed to the industry's lack of social license to operate.

Social license can be defined as "the level of acceptance or approval continually granted to an organization's operations or project by the local community and other stakeholders" (Mazur, Curtis, and Bodsworth 2014, 38). Lack of social license means a lack of goodwill and can give rise to a range of problems, key among which is maintaining access to the resource. Wild fish stocks are a common resource to which governments grant access. If the professional fishing industry does not have goodwill with the constituency, they are more likely to lose out when recreational fishing or conservation groups call for government to exclude professional fishing from certain estuaries and coastal areas. Social license is a key preoccupation for the Australian fishing industry: "For Seafood Industry Australia [a national peak body representing the fishing industry] I would reflect on the members' advisory forum that we had yesterday and the key issue the number one issue that came out of that is social licence" (Lovell 2017, n.p.).

The loss of public trust in the fishing industry is seen as a shared failure by government and industry to transmit to the community the sustainable management of the resource.

[W]e worked twenty to thirty years to change and to improve our processes and to work on sustainability. We need to be acknowledged for that. We want to be acknowledged for that. And science and research has acknowledged us but that hasn't led into sufficient communication back to the community. (Seafood industry organization representative, pers. comm., February 8, 2018)

Industry recognizes that it is their responsibility to communicate about their sustainability credentials to the public, and some initiatives have attempted to do that in recent years. There is, however, limited capacity, especially for smaller companies.

I think the fishers know they have to do it [improve social license], but they don't know how and they're too busy fishing and too busy surviving because they, you know, what was coming out of yesterday's meeting was this fear of access, keeping their access to fishing is their main priority. (Seafood industry consultant, pers. comm., March 8, 2018)

Government actors recognize that government is also responsible for communicating about the effectiveness of fisheries management to help rebuild the social acceptability lost with overfishing in the past. They have, however, been slow to address the problem, and still tend to remain focused on the technical aspects of fishery management. The Fisheries Research and Development Corporation (FRDC) that manages research funding for fishing and aquaculture industries was only enabled by the legislation to invest in marketing from 2018 onwards (FRDC 2018b).

Some of our issues with social licence come from our lack of focus on educating the public and the community about how well we manage our fisheries. (Fisheries manager, pers. comm., March 23, 2018)

The Western Australian state commitment to MSC is fantastic but the missing links are definitely the chain of custody involvement in the project and the communication aspects. That kind of money was ring-fenced towards fishery improvements and certification but not necessarily thinking about how to bring that message back to consumers or to communities. (Nongovernmental organization representative, pers. comm., November 16, 2017)

The disconnection between efforts to manage the harvest of fish sustainably and the lack of tools to address sustainability concerns in downstream processes is thus the result of

two main factors: the lack of involvement by public governors in the space and the partial success of private governors in filling the regulatory gap. The lack of a regulatory level playing field between domestic and imported seafood is aggravated by a lack of effective communication about the sustainability credentials of Australian fisheries to the general public. This leads to a lack of goodwill and uncertain access to fisheries resources.

Consuming Legal, Reported, and Regulated Fish

The problems detailed in this chapter have arisen from the lack of government involvement in sustainability beyond the act of fishing. This policy gap has had an effect further down the supply chain, with seafood industry representatives seeking government regulation in the retail sphere. In Australia, the main industry demand has been to lift the exemption contained in the Food Standards that allows food service outlets (fish and chip shops, restaurants, etc.) to sell seafood without specifying its country of origin. This strategy relies on perceived premiums for fresh local domestic product and aims to avoid product substitution and to explain potential price differentiation between Australian and imported products. Because of the relative stringency of Australian fisheries management, labeling seafood as Australian has also been seen as a proxy for sustainability. The low public awareness of these efforts, discussed previously, is a major flaw in this strategy.

The extension of Country of Origin labeling for seafood in the food service sector has so far only been implemented in the Northern Territory using the avenue enabled through the *Fisheries Act 1988* (NT) that regulates the requirements for fish retailer licenses. Although the demand was initially granted a positive recommendation of Senate Committee inquiry into labeling requirements citing the need of a level playing field for domestic and imported product (Commonwealth of Australia 2014, 27), the Productivity Commission has more recently recommended against the extension (Productivity Commission 2016, 41–42). The Commission provided a clear reminder that environmental provisions belong to the private domain: “Consumer health and safety interests would not be enhanced by such a policy change, and there are practical impediments to implementation. If such arrangements are desired to better meet consumer preferences, industry should apply them voluntarily” (Productivity Commission 2016, 267).

In recent times, a possible instrument to address sustainability concerns in a form compatible with legal frameworks for international trade, food safety, and consumer protection has been located in the control of the legality of seafood. The attention to the lawful sourcing of fish is linked to the emergence of illegal, unreported, and unregulated

(IUU) fishing as a global issue over the past two decades. IUU fishing is considered to constitute a major threat to the sustainability of fisheries and its prevention is included as an indicator in the Sustainable Development Goal 14 (Food and Agriculture Organization [FAO] 2016, 80).

The fight against IUU has highlighted the economic dimension of fishing and the importance of preventing IUU products from entering the supply chain through port state and trade-related measures (Witbooi 2014, 293). Trade-related measures aim to prevent seafood originating from IUU fishing from entering markets by requiring traceability documentation covering the transit of fish from the ocean to the supply chain. Such measures may be multilateral, as in the case of catch documentation schemes (Agnew 2000), or unilateral, as implemented by the European Union (Elvestad and Kvalvik 2015) and the United States (Simões and Dolle 2016). These measures have been accepted under the World Trade Organization regime (Tsamenyi et al. 2010, 30–31). Trade scholars conclude that, despite the challenges they pose to the trade regime, trade-related measures “may have become one of the few practical options to urge uncooperative flag, production, and reexporting states to contribute to and actively engage in the global campaign against IUU fishing” (He 2017, 197).

In the European Union and the United States, anti-IUU trade-related measures have been justified in terms of fisheries management—pursuing environmental, economic and social sustainability of fisheries—on the grounds that (1) IUU fishing may distort market conditions and undermine the economic opportunities of legitimate, well-managed fisheries; (2) there is a need to establish equal controls and a level playing field for imported and domestic product; and (3) there is a threat posed by IUU fishing to the sustainability of the oceans (Department of Commerce—National Oceanic and Atmospheric Administration 2014; European Union [EU] 2008, 1). Although the long-term effect of these measures remains to be assessed, they have been evaluated as “likely to become prevalent and embedded in parts of national, regional, sub-regional and international fisheries governance arrangements to ensure sustainable and responsible fishing practices” (Tsamenyi et al. 2010, 31). This signals the success of a new approach to justify environmental provisions in the trade regime by shifting such concerns from the realm of consumer values to the prevention of market distortions. Measures to prevent IUU thus constitute a new proxy for sustainability that aims at reconciling the conservation of the oceans with its sustainable exploitation—by ensuring that fishing is regulated and seafood harvested legitimately.

Australia has been one of the pioneers in the adoption of multilateral trade-related measures to prevent IUU fishing for its export fisheries (Agnew 2000). However, the adoption of EU-style measures for the domestic market have been objected to by most stakeholders, including fisheries managers:

Traceability and labelling is attracting increasing attention in international fisheries management. Some countries are seeking more information on where and how seafood was caught and whether it is consistent with international, regional and domestic fisheries regulations. Unilateral market measures taken by an importing country can be trade restrictive in that they do not necessarily recognise equivalent or better arrangements put in place by other countries with differing approaches. Some, including the EU and the US, have already implemented market state certification requirements that have caused additional requirements for some Australian seafood exporters. (Commonwealth of Australia 2014, Submission 11, 4)

This objection rests on the key acknowledgment that traceability and labeling are matters of interest for fisheries management. As explored in this chapter, this is not the case in Australia, where traceability and labeling are firmly located in the food safety and consumer frameworks. Instead, fisheries management is disengaged from the postharvest regulatory space and the industry has focused on country of origin as a proxy for sustainability. So far, the potential of anti-IUU measures on imports through traceability schemes has failed to attract the attention of the majority of producers, as well as of the Australian fisheries management authorities.

The lack of sustainability requirements in the postharvest space continues to produce a disconnection in Australia between the efforts to preserve fishery resources and their sustainable exploitation as a food product. Measures to prevent seafood that has not been legally caught in a well-regulated fishery entering the market through traceability documentation would address environmental concerns related to seafood. The existing regulatory framework in Australia fails to accommodate this. The involvement of fisheries management to address concerns in the postharvest space seems a necessary precondition to bridge this gap. However, it remains to be seen whether possible competitive advantages for Australian fisheries will lead the industry to pursue improvements in the traceability of all

seafood sold, and whether the Australian fisheries managers will be willing to venture out of fisheries regulation and into trade regulation.

Acknowledgments

Sonia Garcia Garcia's PhD research is funded by the University of Technology Sydney (UTS) President's Scholarship and the UTS International Research Scholarship

References

- Agnew, David J. 2000. "The Illegal and Unregulated Fishery for Toothfish in the Southern Ocean, and the CCAMLR Catch Documentation Scheme." *Marine Policy* 24, no. 5: 361–74. doi: 10.1016/S0308-597X(00)00012-9.
- Auld, Graeme. 2014. *Constructing Private Governance*. New Haven, CT: Yale University Press.
- Barclay, Kate. 2012. "The Social in Assessing for Sustainability: Fisheries in Australia." *Cosmopolitan Civil Societies: An Interdisciplinary Journal* 4, no. 3: 38–53. doi: 10.5130/ccs.v4i3.2655.
- Bellchambers, Lynda M., D. J. Gaughan, B. S. Wise, G. Jackson, and W. J. Fletcher. 2016. "Adopting Marine Stewardship Council Certification of Western Australian Fisheries at a Jurisdictional Level: The Benefits and Challenges." *Fisheries Research* 183: 609–16. doi:10.1016/j.fishres.2016.07.014.
- Blewett, Neal, Nick Goddard, Simone Pettigrew, Chris Reynolds, and Heather Yeatman. 2011. *Labelling Logic. Review of Food Labelling Law and Policy*. Canberra: Commonwealth of Australia.
- Clark, Anna. 2017. *The Catch: The Story of Fishing in Australia*. Canberra: National Library of Australia.
- Commonwealth of Australia. 1991 "Fisheries Management Act," 60 edn, vol. 162/1991. <https://www.legislation.gov.au/Series/C2004A04237>.
- Commonwealth of Australia. 2014. *Current Requirements for Labelling of Seafood and Seafood Products*. Canberra: Senate Printing Unit, Department of the Senate, Parliament House.
- Department of Commerce—National Oceanic and Atmospheric Administration. 2014. "Recommendations of the Presidential Task Force on Combating Illegal, Unreported and Unregulated Fishing and Seafood Fraud," 79 FR 75536, 79 (243): Office of the Federal Register, National Archives and Records Administration, 75536-41, <https://www.govinfo.gov/app/details/FR-2014-12-18/2014-29628/summary>.

- Elvestad, Christel, and Ingrid Kvalvik. 2015. "Implementing the EU-IUU Regulation: Enhancing Flag State Performance through Trade Measures." *Ocean Development and International Law* 46, no. 3: 241–55. doi: 10.1080/00908320.2015.1054745.
- Emery, Timothy J., Caleb Gardner, Klaas Hartmann, and Ian Cartwright. 2017. "Incorporating Economics into Fisheries Management Frameworks in Australia." *Marine Policy* 77: 136–43. doi: 10.1016/j.marpol.2016.12.018.
- European Union (EU). 2008. *Council Regulation (EC) No. 1005/2008 of 29 September 2008 Establishing a Community System to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing*. Official Journal of the European Communities, O.J. 286.29.10.2008.
- Fisheries Research and Development Corporation (FRDC). 2018a. *What are the Status of Key Australian Fish Stocks Reports 2016*. Accessed November 11, 2019. <http://www.fish.gov.au/Overview/Introduction/What-are-the-Status-of-key-Australian-fish-stocks-reports-2016>.
- . 2018b. *Seafood Marketing*. Accessed June 26, 2018. <http://www.frdc.com.au/Services/Seafood-marketing>.
- Fisheries Research and Development Corporation (FRDC) and Ridge Partners. 2015. *Australian F&A Sector Overview 2014. A Report Supporting the Development of Working Together: the National Fishing and Aquaculture Rd&E Strategy*. Deakin West, ACT: Fisheries Research and Development Corporation.
- Food and Agriculture Organization (FAO) of the United Nations. 2016. *The State of World Fisheries and Aquaculture 2016. Contributing to Food Security and Nutrition for All*. Rome: FAO.
- Hadjimichael, Maria, and Troels J. Hegland. 2016. "Really Sustainable? Inherent Risks of Eco-labeling in Fisheries." *Fisheries Research* 174: 129–35. doi: 10.1016/j.fishres.2015.09.012.
- Hatanaka, Maki, Carmen Bain, and Lawrence Busch. 2005. "Third-party Certification in the Global Agrifood System." *Food Policy* 30, no. 3: 354–69. doi: 10.1016/j.foodpol.2005.05.006.
- He, Juan. 2017. "The EU Illegal, Unreported, and Unregulated Fishing Regulation Based on Trade and Market-Related Measures: Unilateralism or a Model Law?" *Journal of International Wildlife Law and Policy* 20, no. 2: 168–97. doi: 10.1080/13880292.2017.1346351.

- Hogan, Lindsay. 2017. *Food Demand in Australia: Trends and Food Security Issues*. Canberra: ABARES, Department of Agriculture and Water Resources.
- King, Tanya J., and Dayne O'Meara. 2019. "'The People Have Spoken': How Cultural Narratives Politically Trumped the Best Available Science (BAS) in Managing the Port Phillip Bay Fishery in Australia" *Maritime Studies* 18, no. 1. doi: 10.1007/s40152-018-0097-5.
- Lovell, Jane. 2017. "Panel: Australia's Fisheries Management, Ensuring Seafood for Future Generations. Jane Lovell, Caleb Gardner, Colin Tannahill, Stan Lui." *Seafood Directions Conference 2017*, Sydney. Accessed June 10, 2018. <http://www.seafooddirectionsconference.com/pages/conference-arch-seafood-directions-2017-66.html>.
- Macfadyen, Graeme, Gilles Hosch, Nina Kaysser and Lyes Tagziria. 2019. *The IUU Fishing Index, 2019. Country profile, Australia*. Poseidon Aquatic Resource Management Limited and the Global Initiative Against Transnational Organized Crime. Accessed February 21, 2019, <http://iuufishingindex.net/profile/australia>.
- Marine Stewardship Council (MSC). 2018. *Australian Western Rock Lobster*. Accessed June 2018. <https://fisheries.msc.org/en/fisheries/australian-western-rock-lobster/about/>.
- Mazur, Nicole, Allan Curtis, and Andy Bodsworth. 2014. *Let's Talk Fish. Assisting Industry to Understand and Inform Conversations about the Sustainability of Wild-catch Fishing. FRDC Report 2012/301*. Canberra: Fisheries Research and Development Corporation.
- Pascoe, Sean, James Innes, Renae Tobin, Nathalie Stoeckl, Samantha Paredes, and Kieron Dauth. 2016. *Beyond GVP: The Value of Inshore Commercial Fisheries to Fishers and Consumers in Regional Communities on Queensland's East Coast. FRDC Project 2013-301*. Canberra: Fisheries Research and Development Corporation.
- Productivity Commission. 2016. *Marine Fisheries and Aquaculture, Final Report*. Canberra: Australian Government, Productivity Commission.
- Simões, Bruno, and Tobias Dolle. 2016. "The Global Combat against IUU Fishing: The United States Proposes a New Seafood Traceability Program." *European Journal of Risk Regulation* 7, no. 2: 421–25. doi: 10.1017/S1867299X00005833.
- Tsamenyi, Martin, Mary Ann Palma, Ben Milligan, and Kwame Mfodwo. 2010. "The European Council Regulation on Illegal, Unreported and Unregulated Fishing: An International Fisheries Law Perspective." *International Journal of Marine and Coastal Law* 25, no. 1: 5–31. doi: 10.1163/092735210X12589554057604.

Witbooi, Emma. 2014. "Illegal, Unreported and Unregulated Fishing on the High Seas: The Port State Measures Agreement in Context." *International Journal of Marine and Coastal Law* 29, no. 2: 290–320. doi: 10.1163/15718085-12341314.