18 September 2020

Director
Perishable Agricultural Goods Inquiry
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

By email aginquiry@accc.gov.au

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Dear Sir/Madam,

Perishable Agricultural Goods Inquiry

We are pleased to make this brief submission to the Inquiry.

By way of background, Sydney Fish Market Pty Ltd (**SFM**) operates a working fish market trading in approximately 13,000 tonnes of seafood each year. Approximately 85% of SFM's supply is sourced nationally with the remainder coming from overseas.

Every weekday, SFM trades approximately 100 different seafood species and up to 500 across the course of a year. From a base of over 300 registered buyers, approximately 150 fishmongers, wholesalers and restaurateurs purchase from our auction each day. In addition to our auction operation, SFM also manages a retail site that includes six wet fish retailers as well as several cafes and restaurants, each of which sells both local and imported seafood.

SFM is strongly supportive of a competitive and sustainable market for seafood trading. By facilitating a daily auction trading process, SFM performs a vitally important role as a price maker for the Australian seafood industry. SFM has been using the Dutch clock auction system to conduct physical auctions since 1989. This system ensures product is sold quickly while achieving premium prices, thereby delivering efficient and equitable outcomes for all stakeholders in the Australian seafood supply chain.

Recently, SFM has been looking to enhance its seafood trading offering by establishing a new best in class on-line digital trading platform, tailored specifically for the Australian market. SFM's plan to establish this platform has been accelerated as a result of the COVID-19 crisis.

The objective is to deliver a comprehensive cloud-based digital marketplace-type platform that provides robust functionality to support seafood trade, as well as additional capabilities that will drive a strong customer experience and provide value for SFM's stakeholders.

SFM's on-line trading system is intended to revolutionise the fishing industry and benefit all participants. The system will be designed to be accessible to seafood producers and buyers across Australia, providing an open and transparent national marketplace.





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The system is intended to provide greater control for suppliers and vastly increased options for the marketing of their product. When implemented, the on-line system will:

- Enable fishers to trade their produce on-line, potentially whist still at sea.
- Provide a range of transaction methods, including direct sale, on-line auction, fixed price treaty, or a combination of sales methods to suit the suppliers' circumstances, in addition to the existing physical auction process.
- Reduce transport and other logistics costs, providing greater efficiencies via direct supply from fishers to buyers.
- Increase the number of available buyers, with all major Australian markets having direct access to product.
- Provide a more open and transparent market for seafood in Australia, benefiting suppliers by improving the visibility of trading opportunities.
- Provide increased trade in seafood in regional centres.
- Open increased opportunities for participation in export markets.
- Provide immediate reporting of transactions and visibility of market activity and transactions in real time.
- Allow direct interface with regulators, simplifying registration, lodgement of catch and other required data (SFM is working with regulators on how this can be achieved).

These benefits are intended to transform the way that seafood is marketed, not only in the short term but also underpinning faster economic recovery and productivity growth in the seafood industry in the longer term.

SFM would be pleased to provide further information in relation to the physical Dutch auction process, our proposed digital trading system and SFM's vital role as a price maker in the Australian seafood supply chain.

Please contact me on 0400 990 009 or at michaelg@sydneyfishmarket.com.au if this would be of assistance to the inquiry.

Yours sincerely

Michael Guilday General Counsel

Sydney Fish Market Pty Ltd