



SUBMISSION, JUNE 2023

SENATE INQUIRY INTO GREENWASHING

The Marine Stewardship Council (MSC) is an international non-profit on a mission to end overfishing by setting the world's leading standards for sustainable fishing and seafood supply chain assurance.

We welcome the opportunity to contribute and participate in the Senate Standing Committee on Environment and Communications' inquiry on greenwashing, which can only be a good thing, and we welcome efforts to ensure eco-friendly claims made on products are legitimate, clear, and substantiated.

THE IMPACT OF GREENWASHING

Greenwashing is an underestimated deterrent to incentivise and advance best practices in sustainable fisheries management and sustainable seafood.

Greenwashing undermines the significant commitment and momentum demonstrated by a broad spectrum of groups doing the right thing across governments, industry, fishing communities, businesses, scientists, and conservation organisations worldwide, as in Australia.

RECOMMENDATIONS

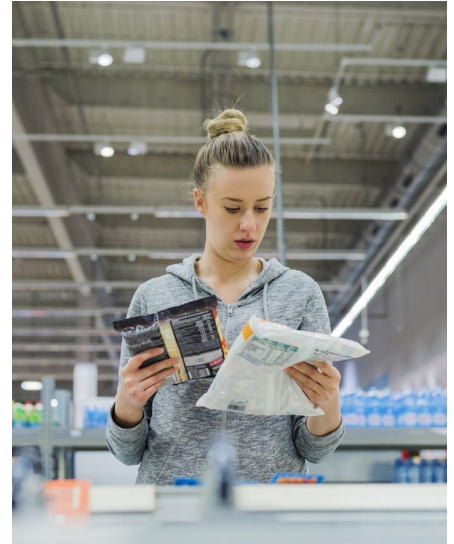
- ✓ Leverage the credibility principles identified by ISEAL
- ✓ Conduct large-scale consumer awareness campaigns
- ✓ Provide clear and explicit guidelines on permissible environmental claims

In recent years, there has been a proliferation of sustainability claims on products, and ecolabels are important in providing consumers with an easy and trusted reference point to make an informed purchase decision. It is the job of robust, third-party certifiers to raise and maintain the bar on sustainability.

The problems of greenwashing include:

1. misleading or confusing claims
2. sustainability labels that don't meet a minimum bar of transparency and may not be credible

The MSC strives to counter greenwashing with a globally consistent certification scheme, clear information, and substantiation of claims on our website and in public awareness campaigns.



CONSUMER EXPECTATIONS IN AUSTRALIA

Consumer research carried out in 2022 with over 20,000 consumers globally, including Australia, shows that 78% of consumers who have seen the MSC label trust it. Australian seafood consumers are increasingly taking action to protect the future of seafood amongst high levels of concern for the ocean and are looking for credible organisations they can trust.

The [independent research that Globescan](#) carried out on behalf of the MSC also showed that clarity on claims, strict standards and independence are important to consumers.

- 41% are familiar with the MSC blue fish tick label.
- 79% believe that supermarkets' and brands' claims about sustainability and the environment need to be clearly labelled by an independent organisation.
- 78% believe that we must consume fish and seafood only from sustainable sources to save our ocean.
- 45% of consumers say the top action they are willing to take to protect the fish and seafood in our ocean is to purchase more sustainable seafood.

THE MSC'S FOOTPRINT IN AUSTRALIA

More than half of wild-caught landings in Australia are certified to the MSC's Fisheries Standard, approximating 91,269 tonnes with 30 Australian fisheries engaged, which includes state and commonwealth-managed fisheries across 40 species.

Over a decade ago, the Western Australian state government allocated AUD14.65 million to pre-assess their commercial fisheries to the MSC's independent, world-class, science-based Fisheries Standard.

This move is exemplified worldwide as a benchmark of solid government and industry commitment to sustainability.

MEETING BEST PRACTICE

The MSC is the only wild-capture fisheries certification and ecolabelling program that meets the best practice requirements of the United Nations Food and Agriculture Organisation (UN FAO) and the ISEAL Alliance.

The ISEAL Alliance exists to drive best practices in eco-labelling, and members must comply with its robust requirements for assessing sustainability. The MSC complies with ISEAL's requirements, which already include independent evaluations of standard-setters and robust supply chain assurance systems, which should help inform and substantiate green claims.

ISEAL is closely and actively involved with the Green Claims Directive in the European Union and the Commission's efforts to introduce more stringent regulations to tackle greenwashing, enabling consumers to make informed purchasing decisions.



The first fishery in the world to be MSC certified was the Western Rock Lobster Fishery in Western Australia in 2000.

In 2017, the MSC became the first global seafood certification program recognised for rigour and credibility by the Global Sustainable Seafood Initiative (GSSI). The MSC was recognised as a tool to achieve indicators in the UN Biodiversity Framework at COP-15 in December 2022. Several independent studies have also found the MSC label among the most trustworthy and widely available indicators of sustainable seafood.

THE MSC FISHERIES STANDARD

The MSC Fisheries Standard is the leading international standard for sustainable fishing and is used to assess if fisheries are well-managed and environmentally sustainable.

Our Standard is based on the United Nations FAO guidelines for ecolabelling and reflects the most up-to-date understanding of fisheries science and best practice in fisheries management.



The roll-out of the MSC Fisheries Standard version 3.0 in May 2023 follows the most extensive review of marine science and fisheries best practices ever undertaken by the organisation.

The new Standard is the culmination of more than four years of research, public consultation and testing, during which the MSC reviewed more than 600 submissions from stakeholders around the world, including Australia, with expertise in fishing, ocean conservation, certification, and seafood.

The launch of the new Standard means that fisheries catching seafood sold with the MSC's blue label will remain leaders in sustainable fishing, going further to protect marine wildlife, fish stocks and ecosystems.

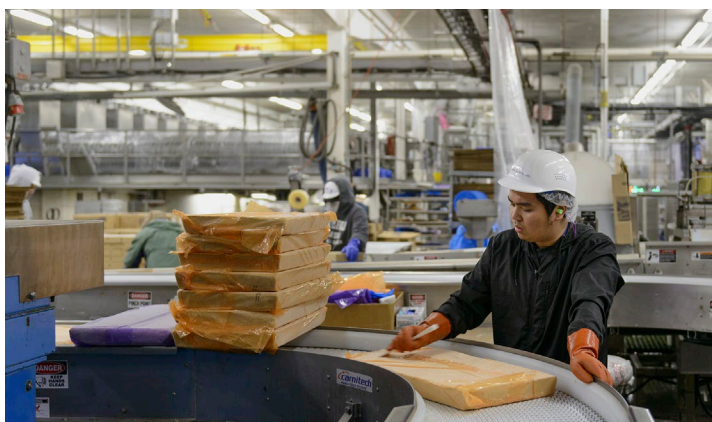
SUPPLY CHAIN ASSURANCE

Another important area to consider is the assurance of the supply chain. Any label that does not include Chain of Custody assurance is in danger of greenwashing. If you cannot be sure where a product has come from and its supply chain, then you cannot be sure of any claim about its sustainable production.

The MSC, for example, carry out unannounced audits and have checks in place that ensure a fish or seafood product only carries the blue MSC ecolabel when it has been sourced from a supply chain that is certified to handle seafood from fisheries meeting the MSC's Fisheries Standard. For more about how we work as a standard-setter to drive continuous improvement, visit: [How we meet best practice | Marine Stewardship Council \(msc.org\)](https://www.msc.org).

TRANSPARENCY AND DISCLOSURE

For anyone wanting to know more about MSC-certified fisheries or what our label represents, we publish fishery assessment reports and information about our assurance processes and standards on our website.



CONTINUOUS IMPROVEMENT

When we review the MSC Fisheries Standard, this is a public process that welcomes wide-ranging consultation. Not all labels provide this level of transparency, credibility, or rigour.


The comprehensive findings are publicly available and speak to the transparency and rigour of the MSC certification process. No other sustainable seafood certification or rating process has such a level of public scrutiny or independent checks and balances to ensure that any allegations are investigated and acted upon if proven.

CASE STUDY

In April 2023, [we commissioned research with YouGov](#) to understand what consumers of canned tuna in Australia think about sustainability claims on pack.

Despite best intentions, nearly two in five Australian canned seafood consumers (37%) claim they can't easily find sustainable tuna when shopping, and over two in five (43%) can't see many canned tuna brands on the shelf that have an ecolabel from a trusted independent organisation. Almost half (45%) are confused about what they should look for.

Aussies want to shop sustainable tuna,
but availability and information is lacking

57%  of Aussies are trying to seek out sustainably sourced tuna

The average household consumes **36** cans/year 

3 in 5 would be more likely to purchase canned tuna if it had a trusted ecolabel such as the MSC blue fish tick 

Source: Canned Tuna Consumption Research conducted by YouGov, April 2023, n=1,023 AU canned tuna consumers

The findings come from a study conducted online by YouGov between the 14th – 17th of April 2023. The sample comprised 1,023 Australian canned tuna consumers, nationally representative. Following the completion of interviewing, the data were weighted by gender, age, and region to reflect the latest population estimates.

RECOMMENDATIONS

1. Leverage the credibility principles identified by ISEAL

Given the wide range of sustainability systems, how do we know the most credible ones? ISEAL's Credibility Principles define the core values of credible and effective sustainability systems. They provide the foundations for systems to deliver greater impact.

These principles help businesses, governments, and civil society to identify systems that can be effective partners in delivering against shared sustainability objectives. They include:

- **Sustainability impacts** - A credible sustainability system makes a difference where it matters.
- **Collaboration** - A credible sustainability system works with others to create change.
- **Value creation** - A credible sustainability system adds value.
- **Measurable progress** - A credible sustainability system can demonstrate the difference it is making.
- **Stakeholder engagement** - A credible sustainability system listens and learns.
- **Transparency** - A credible sustainability system earns trust by being open and honest.
- **Impartiality** - A credible sustainability system is impartial.
- **Reliability** - A credible sustainability system provides trustworthy assessments of users' performance.
- **Truthfulness** - A credible sustainability system's claims and communications can be trusted.
- **Continual improvement** - A credible sustainability system keeps improving.



2. Conduct large-scale consumer awareness campaigns

With the proliferation of claims in the marketplace – educating consumers through a long-term awareness program will continue to be an ongoing necessity, whether through a central portal on the website for consumers to access and trust the information contained.

For extended resources, credible organisations like third-party certification schemes that comply with international standards can be leveraged and tapped into to support such initiatives.

3. Clear and explicit guidelines on permissible environmental claims

Companies should continue to be encouraged to communicate and educate consumers about the environmental credentials of their products.

Clear guidelines for these environmental claims should be spelt out, such as the criteria listed above that the MSC complies with, for example, conformance to international standard-setting bodies; best practice; transparency and disclosure; supply chain and traceability assurance; verifiable; independence; rigour, etc. to name a few.



CONCLUSION

We welcome the intention of this inquiry as it is essential that consumers can trust green claims and logos to ensure a shift toward more sustainable consumption. Proven and reputable international standards and certification systems that have adopted credible practices have an important role in this transition. We have at heart a market where not only consumers are protected and empowered but also where companies that are making significant investments and progress towards leveraging the positive impacts of their products and supply chains are rewarded.

Given the imperative to deliver the United Nations Sustainable Development Goals (SDGs), agreed by 193 nations, including Australia, the MSC has set an aspirational target to engage 30% of global fishery landings in the program by 2030. Credible market-based programs such as the MSC can complement and support Government and regulatory agencies' policy objectives to deliver sustainable seafood for businesses and consumers. There is an urgent need to scale the delivery of proven and workable solutions, as our ocean is under enormous pressure and stress.

The MSC welcomes any opportunity to support the initiative to address the prevalence of environmental greenwashing in Australia through strategic discussions, feedback, information, or in any other format and way desired.



APPENDIX

The MSC's theory of change



- 1 Fisheries**
that meet the MSC Standard are independently certified as sustainable
- 2 Retailers and restaurants**
choose MSC certified sustainable seafood
- 3 A traceable supply chain**
assures consumers that only seafood from an MSC certified fishery is sold with blue MSC label
- 4 Consumers**
preferentially purchase seafood with the blue MSC label
- 5 Market demand**
for MSC certified seafood increases
- 6 More fisheries**
choose to improve their practices and volunteer to be assessed to the MSC Standard

Our program enables everybody to play a part in securing a healthy future for our oceans.

7

MSC 2021-22: a year in numbers

MSC impact on the water:

19% of assessed wild marine catch was engaged* with the MSC

628 fisheries engaged in the MSC program

2,087 recorded improvements made by MSC certified fisheries up to 31 March 2022

*engaged means certified, suspended or in assessment to MSC



MSC impact on the market:

20,447

products with the blue MSC label

US\$12.28 billion

retail sales value

62

nations where consumers can buy products with the blue MSC label

46,277

sites with Chain of Custody certificate holders

6

APPENDIX

Contributing to global goals



14

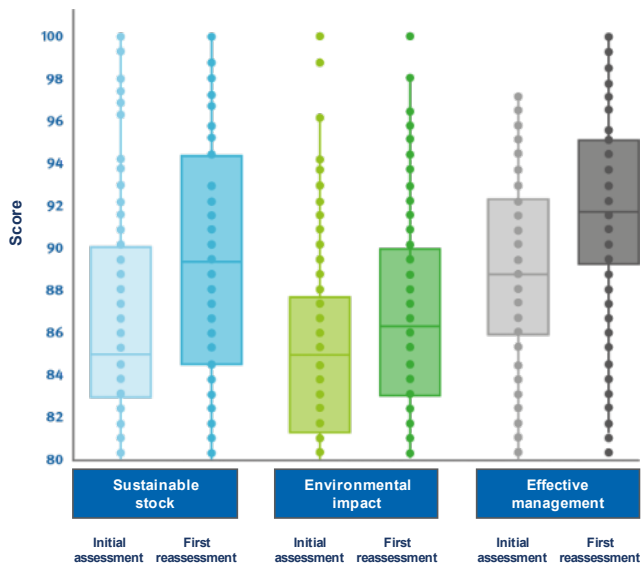
LIFE
BELOW WATER

Fisheries meeting the MSC Fisheries Standard are helping deliver on at least **34 different SDG targets.**



Certification is just the beginning...

Fisheries improve their practices as they stay in our program



APPENDIX

MSC certified fisheries and healthy oceans

2,087

improvements made by
MSC certified fisheries
up to 31 March 2022

Including 418 in the last
three years, consisting of:



161

improvements benefiting endangered, threatened and protected species, and reducing bycatch



107

improvements benefiting stock status and harvest strategies



76

improvements benefiting fishery management, governance and policy



74

improvements benefiting ecosystems and habitats

Improvements in fisheries are often driven by conditions of certification that require them to achieve global best practice on all performance indicators. A condition is set if a fishery achieves minimum sustainability requirements on an indicator (60) but less than best practice (80) and is closed when it attains this.



CONTACT US

Anne Gabriel

MSC Program Director, Oceania & Singapore

Marine Stewardship Council
Building 6, 202 Nicholson Parade
Cronulla NSW 2230

msc.org/en-au

FOR THE ATTENTION OF:

Committee Secretary

Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600