Submission 3

While the idea of no-grow zones is a good idea. I think the current map is probably too restrictive. Surely there can be some other areas where salmon farming could occur.

Submission 4 – Darren Briggs

I can not see anywhere where the general public or more importantly the recreational fishers have anything to gain by the proposed expansion area’s. But... they have a whole lot to loose. The area in the far NW of Tasmania is one of the only remaining places that has not been confounded by commercialisation, let it be.

This area (the far NW) is an unreal non-routed pristine environment that is the breeding ground of many of the recreational fish species throughout the entire NW of the state.

I think it is about time the recreational fishers of Tasmania are taken into consideration when any expansion or further commercialisation of our natural ocean assets are considered.

Submission 5 – Bradley Hardy

Many people are against the idea of fish farming in the north west but as a professional fisher from stanley I believe with good management of areas in which pens are placed this could be very good for the circular head area. But I also strongly believe if pens are placed in the wrong areas ie stanley to rocky cape then this could have large negative impact on our area !!

Submission 6

I have seen first hand, throughout my 30 years on Bruny, the destructive nature of salmon farming in the Channel area. As a frequent recreational diver for crayfish and abalone, I have witnessed areas of abundance turned into underwater wastelands. I am not exaggerating. Algae-like growth and dust blankets the seabed, smothering native seaweeds and kelp, leaving long stretches of shoreline with barely a sea creature in sight. This is especially bad around the south channel near Partridge Island, and to the north near Conningham. The salmon industry needs to step up to the true meaning of "sustainable".

Submission 7 – Chris Wells

1. This plan is shambolic and simply follows the industry wherever they wish to go
2. There is no acknowledgement of the clear conflict of interest in the Minister for growth being the Minister for the environment - a chronic ongoing tasmanian problem
3. In the departments there is a similar conflict of interest between regulators and industry development celebrants
4. The plan does not define oceanic (or estuarine) ie this could just be salinity based not regulated by depth or distance offshore - a fatal flaw in the plan.
5. The plan celebrates the doubling of the current industry. Clearly and demonstrably to date the expansion has been unsustainable and there is nothing in the plan to suggest industry improving its methods

6. There is nothing in the plan to inform how overstocking is going to be stopped

7. There is nothing in the plan about cleaning up the current mess in the channel or in Macquarie Harbour other than suggestions about everyone (and only industry participants) getting together and having a chat

8. The plan is a mere holding pattern to allow unlimited industry expansion

9. A scientific document requires peer review and an evidence based approach. This is a political plan and nothing more

10. Okehampton Bay will be ruined by 2022 Where to from there?

11. Staff involved in writing, editing or approving this this plan should be deeply ashamed. It is superficial gibberish of the worst kind. It could have been whipped up by a political minder in an afternoon and reads like it was.

Submission 8 – no comments

Submission 9 – Hans Wapstra

This is a sad "plan". It is written as an election platform with lots of spin to show how good the Government is - the word "government" appears no less than 55 times.

It is also written to show what a great industry it is. Everybody knows this and there should be no place in this plan to blow the industry's trumpet.

It talks in generic terms (with lots of spin) about environmental performance, nothing specific. There is little or no reference to protecting the environment, in fact the word occurs mostly in the context of environmental regulation and environmental sustainability. It does not acknowledge the damage already done in many areas, in fact, the word "damage" does not appear anywhere. Yet this is why it is such a public and controversial issue at present. It presents no solutions to the damage done or future damage, except with weasel words like regulation, sustainable etc.

A good salmon farming management plan should focus and what is happened and clearly identify how it will be fixed.

And by the way, the maps are totally useless as they lack any detail that enables the viewer to identify the places with any accuracy.

The questions are framed in such a way that "agree" or "strongly agree" are the only options. How could you not agree without making a fool of yourself. Very cleverly done. This is not proper consultation.

In summary, I view this plan as a political document. It just maintains the status quo. The government and the industry remain cuddled together in a nice warm bed, and the plan enables the government to answer any valid criticisms by referring to the plan but not actually doing anything.

Submission 10

World best practice is on shore closed loop farming, in conjunction with a green leaf aquaponics farm. All fish pens in the ocean should have tarps under them to catch all waste, until they are moved to an one shore facility. The corruption must also be stamped out within the industry and
government. All fish farm ropes should be labelled with the owners name in the core of the rope just like telecom used to do and last but not least Okhampton Bay must be stopped.

**Submission 11**

This draft plan is nothing but smoke screens!!! and looks like it has been written by the salmon industry. This industry is Killing "brand Tasmania" as well as the environment there is so much at stake here !!! and the government is just not listening!!! worlds best practice is never going to happen until the industry gets established on dry land with a closed loop system !!! (wow what a boom that would be for the Tas economy)

What we have in Tasmania is so unique, great tourism, a wild caught seafood industry , pristine ocean wilderness, great recreational fishing and water sports.

You guys really have no idea !!!  Do You !!! all you care about is short term $$$ !!!

What about Bio security for Native species ?

What are you doing about coastal algal Blooms!!! they are in every region where there are Salmon farms ??

Why are you lowering bag limits for native fish to protect stocks but allowing the salmon industry to destroy habitat??

Have you done at time in motion study in places like Triabunna bay to assess water traffic & congestion problems ??

And how on earth can you allow the major salmon hatchery to operate within the Derwent water catchment that supplies fresh water to southern Tas.???

Sorry guys the list goes on and on, your draft plan is a big fail, the salmon industry at the moment is self regulated and unsustainable and you are a big part of it .

I am all for a sustainable salmon industry, but you guys really need to get it right and look past the $$$ signs and start listening.

**Submission 12**

Any thing the Government, [either side] and bureaucrats get involved in is bound to cause problems can't be trusted, who cleans up the mess when Tasal go broke not taxpayers money, those who allowed the mess must be held personally liable

**Submission 13**

Introducing industrial fish farming to the pristine waters around Stanley and the Hunter islands is so wrong - inshore fish farming should be phased out and on land farming should become the norm.

Tassal should be required to clean up the mess they have created in Esperance both in the sea and on land. Most of the questions in this survey are self serving and do not adequately address public concern about a polluting and out of control industry that continues to automate and phase out the jobs they purportedly provide. If the government was serious they would increase lease costs to better reflect the public subsidy every Tasmanian pays in allowing a polluting industry to destroy the public waters they can no longer enjoy. If the industry paid a more realistic price for access to trashing a public good maybe on line farming would become competitive.
Submission 14

I have long been a supporter of the Tasmanian Salmon Industry, however, recent disclosures on the issues surrounding farming in and around coastal areas has caused me considerable concern. As a recreational diver I have seen first hand the damage that salmon farming has caused to the environment including kelp beds and surrounding native fish habitat.

I am extremely concerned about the proposed Okehampton site and the impact that this will have on a beautiful part of our coast line. As a frequent line fisher and diver in this area I can not understand why we are going ahead with it when the proposed employment numbers just don’t stack up against our tourist numbers that frequent the area. I often take International travellers to Okehampton bay as you are always guaranteed to catch a few flathead in a an area that is protected from the wind and has such beauty.

As a diver in the Orford area, I am concerned that the new fish pens will attract more seals to the area and subsequently more sharks (Great Whites). After the loss of a diver in the area to a shark attack two years ago, it does not appear that any consideration has been given to this by the Government.

Whilst I will continue to support our Salmon Industry I want to ensure that we no longer put these farms in the wrong place.

Please don’t go ahead with the Okehampton bay proposal

Submission 15 – no comments

Submission 16

I believe the proposed reference group should also include members of both the professional and recreational fishing groups.

The EPA must be given well known and strong powers of enforcement to the extent that they can move in and actually shut down leases where non compliace issues are not being addressed or the lessee is slow in doing so. The EPA also needs greater autonomy and independence from government.

Submission 17 – Ingerlise Armand

Fish-farming is a CRUEL and POLLUTING industry and should be banned altogether! Full Stop.

We used to have clean and pristine waters around Tasmania. Not anymore.

How dare the fish farmers spoil the waters for everybody else?

Salmon is a migrating specie and should never be locked up in cages, it is as cruel as cage chickens.

Submission 18 – Juliet Quaterman

I cannot support fish farming. I have been snorkelling in the Coningham region for at least 8 years now and I have seen a progressive deterioration in the marine environment with a much greater accumulation of slimy algal growth due to the detritus and added nutrients in the water from the larger increase of fish farming in the area. This must stop!!!! If fish farming is to be continued it
should carried out in the outer sea areas, but even so these should be carefully monitored by an independent body and all detritus removed. The only truly sustainable way to carry on fish farming is for a fully enclosed system built on land. However I cannot support fish farming on principle as I also hate all current factory farming methods which is cruel to animals. If everyone gave up eating meat and fish farmed by these inhumane practices it would stop the suffering of these animals and also help the environment. Thank you

Submission 19 – James Michael

Hello, I started answering your survey and then I stopped. This is a Claytons survey...a survey you have when really you do not want to have a survey. A bit like the two dams vote years ago when NO DAMS was not on the ballot paper as a third option. I can not believe this industry that is a scar on our beautiful waterways and the land that is used and linked with the fish farm, is allowed to continue, and even be expanded. The amount of food that has to be produced in KG to end up with fish that is artificially coloured whilst damaging the ecosystems and polluting our beautiful waterways is a disgrace. But what can we expect from a narrow minded government who can only look short term and to election cycles. Just like gaming machines. Put them everywhere, create a massive societal problem that has a $ cost as well as massive social, family and emotional costs, and feel like because you collect a few taxes that it is okay? I could go on, but I am sure you get my point. Michael

Submission 20 – Matthew Morgan

Bio Security is already Compromised by the Seal Relocation Process 2000 plus Seals bought
To the Northwest of the State Anually 40% retention
To NW our Commercial and Amateur Fishing is being Unfairly Interacted by Seals that dont Naturally Belong here
Secondly the Proposed Sites of 3 Hummocks and Adjacent Island and Channels weed beds
Are a huge Juvenile Fish Nursery Area
No Finfish or Salmon Farms on the Northwest Coast even the suggestion is Offensive to me and most of Our community

Submission 21 – Ken Burridge

when issuing an environmental licence the EPA should include the capture of waste from the fish pens that are within 1 nautical mile from land, the same regulations that will apply to vessels from Nov 2018

Submission 22 – no comments

Submission 23 – Stephen Pawlus

Why keep expanding the industry to the detriment of the environment. It seems where ever these pens are set up, it has a adverse impact on the environment. Go off shore and stay out of protected areas that are vulnerable to your draconian farming techniques. I came to Tassie 7 years ago and this states greatest asset is Tourism. No fish farming in Tassies’ East coast and stop the farm at Okehampton Bay. I'm a small business operator and usually vote liberal, but rest assured if this farm goes ahead, I won't be voting liberal any more!!!
Submission 24 – Robert Rattray

This growth plan indicates areas of interest that are major breeding and harvest areas for the ABALONE, ROCK LOBSTER, SCALLOP & SHARK FISHERIES!!

The specific areas of concern are: S/SW of Bruny Island, East coast of Flinders Island, Robins Island/Three Hummock Islands & the entire coast line of King Island!

Any form of industrial fish farming in these zones in my opinion, would place our well managed sustainable wild fisheries at great risk!

Submission 25 – Tony Jaeger

I am not convinced that the industry is sustainable as it takes a lot of native species to feed the salmon. It is claimed that these native species are not suitable for human consumption. However, they are part of the food chain and to keep harvesting at a more intense rate as fish farming grows it must have a negative effect on native fish stocks in general. Another concern that needs close scrutiny is the amount of raw and untreated faeces that is constantly being injected into our waters, I have fished the waters of the D'Entrecasteaux Channel as an amateur fisherman for the past 30 plus years and have recorded my catches for each outing including the species and what they had eaten. These records and observations indicate to me that not only is there a decline in fish stocks but there is a decline in some species and there is a significant decline in the bottom dwelling food chain such as crabs and octopus, both of which are a significant food source for our native species. I believe that the decline in fish stocks and the lack of food to feed these native fish has been largely caused by the faecal matter that is spreading slowly but surely throughout the Channel and driving the food chain and the fish that feed on them away. They same will happen at Oakhampton Bay as well.

Submission 26

I do not understand why the government & salmon companies cannot pursue land based salmon farming, it would be a win / win situation as there would be no water pollution / destruction, increased employment & the salmon waste would be far easier to collect & perhaps turn into fertiliser therefore creating even more employment. The govt has the means to help with this i.e. increased earnings from stamp duty due to real estate boom atm, & it seems that is is going to be a huge matter at the next election.

Submission 27

The Draft plan does not address changes to the existing Tasmanian inshore marine environment when it is subjected to large sustained volumes of salmon sewerage and waste feed. The focus of this plan is on protecting and expanding the industry and doesn’t address maintaining the quality of our native inshore marine ecosystem. It is clear from Macquarie Harbour that waste from fish farms can degrade large bodies of water and create a so-called dead zone beneath the farms. A moratorium on all new inshore fish farms like Oakhampton Bay should be put in place immediately and no inshore farm expansion should be allowed until base line biodiversity studies are completed. These studies should identify the changes to the existing species and density of marine plants and animals radiating out from the farms until pre-existing biodiversity is achieved. Studies should be conducted to determine sustainable stocking/farming levels. Experimental improvements such as waste capture systems should be trialled within current operations not as a means to expand industry. Any current expansion should be limited to offshore.
Submission 28
While I agree with the broad areas of potential development, I most certainly would not want to see any leases over the top of, or within close vicinity of any rock lobster or abalone grounds! Furthermore, I would not want to see the new lease sites impact on any commercial scale fisheries.

Submission 29 – Steven Brinkhoff
I would like to see the entire industry make honest and significant moves immediately to become totally land based.

Submission 30
The Draft plan does not address changes to the existing Tasmanian inshore marine environment when it is subjected to large sustained volumes of salmon sewerage and waste feed. The focus of this plan is on protecting and expanding the industry and doesn't address maintaining the quality of our native inshore marine ecosystem. It is clear from Macquarie Harbour that waste from fish farms can degrade large bodies of water and create a so-called dead zone beneath the farms. A moratorium on all new inshore fish farms like Okehampton Bay should be put in place immediately and no inshore farm expansion should be allowed until base line biodiversity studies are completed. These studies should identify the changes to the existing species and density of marine plants and animals radiating out from the farms until pre-existing biodiversity is achieved. Studies should be conducted to determine sustainable stocking/farming levels. Experimental improvements such as waste capture systems should be trialled within current operations not as a means to expand industry. Any current expansion should be limited to offshore

Submission 31 – Greg Baxter
I have considerable concerns about the regulation of this industry going forwards. Both the industry and the EPA have failed the wider Tasmanian community in allowing a reckless expansion in local waters which belong to all Tasmanians. From a recreational and environmental perspective, this has had dire consequences.

The future of this industry must be shore based on private land or that leased from the government. This would align it with world's best practice as demonstrated in parts of Europe and Scandinavia, and give it the social licence it so badly needs. In such a model the problem of effluent becomes a valuable asset as fertilizer offsetting other operating costs.

The state government must get passed the notion that a seemingly good outcome can always be scaled up. Promoting industries past their use - dates or super sizing them, is not promoting a smart culture.

Submission 32 – Greg Gill
Would have been totally supportive of the salmon industry but for the fact I have snorkelled for decades off Coningham Point and over the years since salmon pens have been in that area I have noticed the water quality deteriorate, specifically a layer of what looks like sediment on all the seaweed.
Submission 33 – Rosalind Lorenz

I am totally against any further expansion of salmon farming in sensitive areas. The proposed plan of expansion in the Channel area is not in any way a good idea. This area at one time was a good place for fishing, now people are lucky to catch anything. Far less Dolphins are seen here, why would they come there is no food. The locals love their area, Tourists spend time here and comment on the beauty of the place, im sure they will not want to look upon salmon pens. Greed is pushing this move, we and many of our friends have stopped buying Tassal and Huon salmon because of their lack of care in the industry. Pollution, noise and visual ugliness, is not wanted!

Submission 34

The sustainable salmon plan still doesn’t outline how it will deal with:
- Increased nutrients
- Decreased DO
- Toxic algal blooms
- Seals (will they all be relocated down south where they came from)?
- Increased bacteria loads
- Sharks attracted to the area
- Caps on entrants to the area
- Biomass limitations
- Distance between farms and to other aquaculture

Why doesn’t the plan set limitations from the start, so that the industry will be sustainable, not impact on other stakeholders and move into more oceanic water as discussed rather than the shallow, secluded, non oceanic waters of Perkins bay in the north west? Some limitations should be:
- Minimum depth of 50m. (if the plan is to move the farms into more oceanic locations)
- Minimum distance from shore of 3nm
- Minimum 3nm distance to other marine farms
- Half the biomass of the minimum stocking densities in Macquarie harbor to improve DO and reduce nutrients.
- Zero nutrient tolerance at the boundaries to the leases
- Seal free and waste collection nets
- Salmon morts removed daily to reduce bacteria loads.

Submission 35

I am astounded that upon viewing the map of proposed grow / no grow areas and after hearing representatives from the salmon farming industry state that they require a MINIMUM of 15 metres water depth, that almost the entire coastline from Rocky Cape to Cape Grim is within a currently under exploration or potential for further release area. This is despite the entire remainder of the Tasmanian coastline having a no grow buffer of what looks to be approximately 3.5 kilometres. Included in the potential for further release area is West Inlet and Duck Bay in the Currently Under Exploration zone.

This either shows a scant regard for environmentally sensitive areas or incompetent mapping procedures. Either way it instills little public trust in this draft plan and management of the Salmon Fishery in general.

I am also quite surprised and disappointed that no mention is made of control of seals and the currently unsustainable practice of seal relocation.
Submission 36 – Tony Jaeger

I am not against the industry but I am not convinced that it is sustainable as it takes a lot of native species to feed the salmon. It is claimed that these species are unsuitable for human consumption but they are part of the food chain and to harvest them at a greater rate as fish farming grows, it must have a negative effect on native fish stocks in general. Another concern is the amount of untreated faeces that is constantly being injected into our waters. I have fished the waters of the D’Entrecasteaux Channel as an amateur fisherman for the past 30 plus years and have recorded my catches for each outing including the species and what they have eaten. These records and observations indicate to me that not only is there a decline in fish stocks but there is a decline in some species and there is a significant decline in the bottom dwelling food chain such as crabs and octopus, both of which are a significant food source for our native species. I believe that the decline in fish stocks and the lack of food to feed these native fish has been largely caused by the faecal matter that is spreading but surely throughout the Channel and driving the food chain and the native fish that feed on them away. The same will happen at Oakhampton Bay as well if this proposal goes ahead as planned. The evidence is available in the established farms and a thorough study should be undertaken before any further expansion.

Submission 37 – Ingerlise Armand

Salmon is a migrating specie, and salmon farming is a cruel and polluting industry that is harming the environment.

Salmon farming should be banned altogether! FULL STOP!

Submission 38 – Garry Ridler

This plan is only focused on putting more salmon farms in the local environment. The government did it with oysters and now they are everywhere polluting our coastlines and now you want to do it with salmon. There is not one thing in the plan that discusses the impact on the other community activities and communities that already use these waters. My view is that the government will do it anyway until the offend enough of the community who will stop it through protests and legal action. When will the government learn that they should not commit community owned resources (ie the bays and coastlines of Tasmania) without the support of the community. Salmon farming is a polluter and as we have seen in Macquarie Harbour they cant be trusted. If offshore is the way to go then why are so many areas inshore included in potential farming zones

Enough is enough this industry is just ruining Tasmania’s reputation but the government is just too dumb to know it.

I am against this plan as it has only one intention, that is to put in more salmon farms to the exclusion of any community consultation or engagement about they would like to happen to the areas they use for recreation and enjoyment after all it is the community who own these waters not the government of the day.

Submission 39 – Justin Febey

The expansion of the aquaculture industry is totally inappropriate in the Storm Bay Area when considering the inherent risk posed to migrating whales that are seen annually in the Bay.

My house overlooks Storm Bay, as I write this submission I am observing 3 Humpback whales circuit Storm Bay. Other whale species commonly observed are Southern wright whales, Killer whales, and Bottle nosed dolphins and in recent times Pygmy blue whales have been recorded in Adventure Bay
and Storm Bay.

I am aware of multiple cetacean drownings in fish farm infrastructure in southern Tasmania waters.

More funding by DPIPWE is required to enable auditing and compliance management in regard to wildlife interactions with Salmon farm infrastructure.

I totally support the expansion of worlds best practice, sustainable fish farm operations in Tasmania both terrestrially and ocean based. However an independent non government oversight and integrity committee is required to ensure community trust and support.

Submission 40

The salmon industry currently lacks support from commercial and recreational fishers as we seen - dead zones in Macquarie harbour resulting from overstocking and no waste management.
- poor fishing in the Channel area since expansion of salmon farming, and now no scallop season for at least 5 years
- establishment at Oakhampton Bay despite algal blooms and problem with shellfish.

Submission 41

Enviromently sustainable...? Really??
Was at the TRLFA agm last year, scientists from salmon companies told how pens can only be put in certain areas for 4/6 months out of 24 months? It used to be the opposite!
The environmental data collected thus far has been from the offenders themselves, great the EPA are getting control of it, have a lot of faith in Wes Ford. If he’s aloud to do his job. Wasn’t that long ago, couple of months? Mark Ryan stood there on TV saying how they had affected World Heritage Listed areas of Tasmanias west coast! Somehow they maintain ASC accreditation? ASC is clearly just a Dutch company taking money off foreign companies for not doing their job. Tassal relocated 400 seals last month, 2000 for the year so far! Nothing quite like dumping your problems onto someone else is there? At the end of the day, salmon farming is still a primary production industry with highs and lows, great to have the jobs and the economic return, but not at any cost, there should be a cap, quota if you like as to how much can be produced, end of story
Kind regards
Danny fox

Submission 42 – John Stanfield

Importantly any future of fin fish farming will need to be realised with community support, limiting decision making to government, industry and science is a flawed plan. Many people in Tasmania have concerns with the current impacts of the salmon farming industry and would like a greater presence at the table when decisions are being made!

Thanks for the opportunity to respond to the draft Sustainable industry growth plan for the salmon industry.
This submission will focus on the impacts and perspectives brought by John Stanfield as a recreational fisher in relation to the growth plan. I have significant concern in relation to the current and anticipated impacts of current industry practice and expansion plans. Recent reports of environmental breaches within Macquarie Harbour and advice that areas of the D’Entrecasteaux Channel has been significantly impacted by salmon farming have served to reduce my confidence in
both industry and government to effectively manage wild fish habitat within and around lease areas. Further I believe the planned expansion will limit access and create navigation hazards in and around traditional recreational fishing grounds.

I remain supportive of a sustainable and expanding industry but without a demonstrated capacity to effectively manage the areas entrusted to the salmon industry I am not able to support further expansion at this time. I believe it is reasonable to enable full understanding of environmental impact in current lease areas and effectiveness of waste collection systems prior to any further expansion taking place.

I understand the potential the salmon industry brings to Tasmania in the way of providing monetary and employment opportunities within the state, however this needs to be realised in a way that maintains valuable wild fish stocks and habitat. I encourage the industry to partner with recreational fishers to ensure current concerns are addressed in an open and transparent way prior to progression of this plan. My vision for the future would be a shared amenity where industry and recreation are able to coexist with minimal disruption to either activity.

I am concerned about the effectiveness of current legislation and the regulatory and enforcement ability of the EPA. This concern is validated through suboptimal performance in Macquarie Harbour and the lack of direct action taken to effectively discourage further breaches. While the draft paper indicates these changes have been made over the past 18 months there has been no evidence the required will and force of the EPA is available as an actual deterrent. Without active and visible regulatory effort the statements made lack the credibility to be seen as an effective tool. The single most significant concern is that environmental standards have been breached to the extent that wild fish habitat has been described as dead zones. This is unacceptable and does not provide evidence of capacity within industry or the EPA to manage effectively; it is unlikely the requisite confidence will be forthcoming until current leases are operated in a way that enables clear understanding of activity and emissions and farming practice includes measurable, monitored and sustainable waste catchment and disposal. This will need to be included in development of any onshore, inshore or offshore facility.

To enable assurance of understanding and to prompt confidence I believe it would be a reasonable starting point to see acknowledgement of past mistakes and a commitment for a future that will realise a shared vision for marine farm management. As a state, we should strive for excellence in all that we set to achieve. The draft plan varies in terminology from good to best practice I believe setting a benchmark at the highest standard is needed before the industry embarks on further expansion.

The forward by the minister paints a picture of an industry Tasmanians are proud of including being highly vertically integrated on-island including processing and value adding taking place here. Another perspective might be an industry with reckless ambition to grow at the expense of all else. An industry where legal proceedings are brought between players and against the regulatory body, one where consultation has failed to achieve community support to the extent of food outlet boycotts and activist groups gaining significant support in the form of public protest and social media activity. It would be great if we could start this discussion with a degree of respect for stakeholders outside of industry and government and a broad recognition the fairy-tale picture painted will take significant effort from all sides to achieve.

Building public confidence in the salmon industry

This is vital and currently an area where significant effort is required...
Working with stakeholders to build confidence in the industry. The realisation that industry and government are but two of the players in the market. As industry expands; awareness of the business, lifestyle and recreation affected in the identified areas will enable a more complete understanding of impact and required engagement with stakeholders.

Stopping expansion plans now to enable understanding and consultation is reasonable. The previous target of $1billion turnover may still be achieved with the 2030 timeline remaining a realistic and supported goal if significantly changed environmental standards are implemented and achieved.

Pen and area stocking densities needs to be consistent across industry and set at a level where immediate area impacts are such that wild fish populations are not affected by farming activity.

Technological advances such as waste capture and treatment systems will be developed, trialled, evaluated and if effective implemented across industry. Simply stating offshore as a mitigation to environmental impact needs to be supported by environmental impact statements. Evidence based impact statements will enable independent assessment of impact prior to any full-scale rollout of offshore farming.

Development of onshore facilities will be considered and exploited whenever viable.

All biosecurity issues will be tabled including relevant research and risk assessment and treatment strategies. A full and frank understanding of “at capacity” in relation to inshore zones will need to be explained.

I look forward to supporting development of the Tasmanian Salmon Industry Scorecard to formalise assessment against world’s BEST practice.

Improving the efficiency, effectiveness and transparency of the industry’s environmental regulation, and the effectiveness of its biosecurity systems

Many recreational fishers are untrusting of government taking responsibility for the establishment of regulatory function. The growth plan clearly establishes industry and government as partners. Including regulatory effort as a function of government, even at arm’s length, does not inspire confidence.

I would like additional information around what accreditation assessment will be undertaken and by whom.

What will constitute a breach and what leniency or discretion is available to the regulator?

What guarantees are available to support the independence of the regulator?

Who will be responsible for appointment?

Are terms of employment permanent or fixed term?

Are there minimum qualification standards required for the position?

Is there any delegation of authority required for issuing of fines or other sanctions?

To what extent will evidence of breach be required prior to issuing of a fine or other sanction?

What access to environmental monitoring will the compliance and monitoring service have?

What provisions will there be for independent site inspections and what weight will the reports carry?

Waste capture systems are fully encouraged, this initiative is a significant builder of industry confidence. Any research and development, implementation, monitoring and advertising of results would be welcomed.
Biosecurity is fundamental to a successful industry and incredibly important to recreational fishing, I welcome the importance stated in the growth plan to address biosecurity issues.

Supporting industry growth

I have made comment in this submission in relation to a variance of perspective around acceptance of industry or social licence or public confidence. I agree without concession that the industry requires agreement/support to proceed with this plan. I am supportive of the espoused endeavour and am encouraged by the positive aspects of economic growth and job creation. The reality of brand maintenance is for all parties to be confident in the future, right now that confidence is missing from me and those I speak to in the recreational fishing community. I look forward to working with industry and government as an accepted and respected stakeholder as a part of the representative industry body.

Questions for Industry, IMAS, Government and the EPA

References:

2. Snapshot of the state of the D’Entrecasteaux Channel and lower Huon estuary

Interpretation:

Annelid a segmented worm of the phylum Annelida, such as an earthworm or leech.
Benthic The benthic zone is the ecological region at the lowest level of a body of water such as an ocean or a lake, including the sediment surface and some sub-surface layers. Organisms living in this zone are called benthos, e.g. the benthic invertebrate community, including crustaceans and polychaetes.
Fauna. the animals of a particular region, habitat, or geological period.
Polychaetes a marine annelid worm of the class Polychaeta; a bristle worm. 
Taxonomic concerned with the classification of things, especially organisms.

As a recreational fisher I would like to understand, in more detail, the impact fin fish farming is having on wild fish populations. This curiosity includes a desire to understand any lifecycle affect through changed habitat.

By way of background, anecdotal evidence suggests the impact of fin fish farming is a significant contributor to the reduction of wild fish availability within the D’Entrecasteaux Channel. Widely held opinion of local residents and shack owners is that effluent from fin fish farms is the most significant
contributor to reduced catch rates of recreationally important species such as flathead, flounder, abalone, scallops and crayfish.

Schedule 3 of reference 1 includes the following:

1.1 There must be no significant visual, physico-chemical or biological impacts at or extending beyond 35 metres from the boundary of the Lease Area. The following impacts may be regarded as significant.

Visual impacts:
- Presence of fish feed pellets;
- Presence of bacterial mats (e.g. Beggiatoa spp.);
- Presence of gas bubbling arising from the sediment, either with or without disturbance of the sediment;
- Presence of numerous opportunistic polychaetes (e.g. Capitella spp., Dorvilleid spp.) on the sediment surface.

In the event that a significant visual impact is detected at any point 35 metres or more from the lease boundary, the licence holder may be required to undertake a triggered environmental survey or other remedial activity determined by the Director, EPA.

Physico-chemical:
Redox
- A corrected redox value which differs significantly from the reference site(s) or is < 0 mV at a depth of 3 cm within a core sample.

Sulphide
(Schedule 3)
- A corrected sulphide level which differs significantly from the reference site(s) or is > 250 μM at a depth of 3 cm within a core sample.

Biological:
- A 20 times increase in the total abundance of any individual taxonomic family relative to reference sites;
- An increase at any compliance site of greater than 50 times the total Annelid abundance at reference sites;
- A reduction in the number of families by 50 per cent or more relative to reference sites;
- Complete absence of fauna.

As natural environmental variation renders some locations more susceptible to significant changes in parameter values, the above thresholds will be considered in addition to baseline environmental information for determining the presence/absence of a significant impact.

1.2 There must be no significant visual impacts within the Lease Area. The following impacts may be regarded as significant.

Visual impacts within Lease Area:
- Excessive feed dumping.
- Extensive bacterial mats (e.g. Beggiatoa spp.) on the sediment surface prior to restocking.
- Spontaneous gas bubbling from the sediment.

1.3 Where areas are fallowed due to visual impacts, the Lease Area shall not be restocked until the sediments have recovered to the satisfaction of the Director, EPA.

1.4 The licence holder must comply with any written request from the Director or the Director, EPA...
specifying waste disposal actions for the purpose of mitigating against any effect on the ecology of the marine environment or nearby shoreline associated with marine farming operations including harvesting, processing of salmonids and the removal of fouling organisms.

Question 1: I have presumed that the root cause of bacterial mats and spontaneous gas bubbling is an accumulation of fish excrement, is this correct?

Question 2: In layman’s terms can you explain the correlation between the accumulation of fish excrement and dissolved oxygen levels?

Question 3: What other measurable standards are there available to monitor environmental impact from farming practices? For example nitrogen inputs have been mentioned in Huon’s discussion paper (reference 5) are nitrogen output levels measurable at farm sites?

Question 4: To what extent does excess feed, extensive bacterial mats on sediment surface and spontaneous gas bubbling affect the likelihood of wild fish recruitment, health, growth rates and likelihood to remain in and around a fin fish lease area?

Question 5: What distance from a lease boundary would no visible sign of farming operations occur?

Question 6: Given the lease areas described on page 79 and 80 of reference 3 what is the total area of the D’Entrecasteaux Channel and Lower Huon Estuary allocated to fin fish farming?

Question 7: With regard to the answer to question 5, what is the total area likely to be affected by fin fish farming in the D’Entrecasteaux Channel and Lower Huon Estuary?

Question 8: Given the information provided on page 1 of Snapshot of the state of the D’Entrecasteaux Channel and lower Huon estuary (reference 2) is there any reason why Water sampling stations, Sediment sampling stations and Beach monitoring sites are not co-located with fin fish farming leases?

Question 9: Given the close proximity of fin fish farms to shorelines are there any specific risks to breeding and nursery grounds for bottom dwelling species such as flounder and flathead?

Question 10: Are the environmental requirements detailed in schedule 3 of the Okehampton Bay marine farming licence (reference 1) indicative of the minimised environmental impacts espoused in the Sustainable Industry Growth Plan (reference 4)?

Reference 5 includes the following on page 10:

The proportion of dry feed estimated to be lost by Atlantic salmon to faeces is approximately 15%. These losses result in nitrogen input to the marine environment. Nitrogen input is the key regulatory tool used to set global limits on salmonid production in marine farm development plan areas.

The program has led to the compilation of a comprehensive, area-specific dataset, providing information on environmental conditions within marine farming lease areas and specifically at compliance sites 35m outside lease boundaries for comparison with control sites. This information has been used to assist with the adaptive management of regulatory monitoring.

The results of monitoring in finfish lease areas around the state have confirmed that pen positioning, stocking duration and intensity are the major factors affecting detectable impacts on the benthos. Current flow is typically low and survey assessments have revealed that visible benthic impacts are
localised, with solid particulate waste settlement forming distinct footprint zones directly under pens.

Unacceptable impacts fall into two main categories—any visible farm-derived impact at a compliance site 35 m outside the lease boundary and any significant visual impact within the lease area. This is based on experience at inshore sites and may require reconsideration for offshore sites.

And on page 11: an excess build up of waste beneath pens is as much a biosecurity risk as it is an environmental impact.

Question 11: Given the information detailed in the Okehampton Bay marine farming licence and Huon Aquacultures Salmon Industry Discussion Paper (references 1 and 5) paints a picture of both environmental and biosecurity risks, what are the risk treatment strategies available to manage fin fish farming?

Question 12: The Sustainable Industry Growth Plan (reference 4) refers to technological advances such as waste collection systems yet there is no mention of waste collection in the Okehampton Bay marine farming licence (reference 1); why is that?

Question 13: How effective are the waste collection systems?

Question 14: Given the number of current leases in estuarine waters is there an intention to mandate waste collection? And if so when?

Question 15: Huon Aquacultures Salmon Industry Discussion Paper references Nitrogen input is the key regulatory tool used to set global limits on salmonid production, Is there a way of measuring nitrogen output levels in and around fin fish farms leases?

Question 16: Please give an over view of environmental monitoring?

Question 17: Benthos referenced in reports includes Annelid and Polychaetes is there a reason these appear more than other species? And to what extent are flathead, flounder, abalone, scallops and crayfish monitored?

Question 18: What sanctions are available to the EPA?

Question 19: To what extent are breaches of lease agreements enforceable?

Question 20: In regard to interpretation of environmental data collected, who is responsible for interpretation and reporting and is there a validation or independent or peer review process to confirm results?

Question 21: What amount of feed is used to grow a kilo of salmon?

Thanks for reading, I'll look forward to the response.
Submission 43

Grow and no grow zones
Okehampton Bay and the west side of flinders island need to be removed from the grow zone map, these are world class areas and needs to be protected before any more damage is done to brand Tasmania.

Off shore farming.
Not enough research has been completed yet to approve any expansion into these areas and the effect on the wild fishers is currently unknown. - some investigation into how the clean seas operation in SA is effecting the environment would be a good start - there has been some tests done on growing sea weed close to these cages and it had failed at a range of 100 meters from the cage and was possible within 400 meters - the fish excrement and food has chance to effect a wider area when moved off shore. - This need to be very closely looked at, as it could be worse that the current practices.

Tender process
Yes all research and documentation needs to be produced by the operator and made public before any more new leases can be allowed.

Looking at old leases site.
All old inshore leases site need to be closed down over time for the future benefit of brand Tasmania - move on shore.

Mac harbour
Working together to make corrections and close down the sites - this needs to be worked through as a group, set up the strategy to move on shore in Mac Harbour first.

Marine rubbish
Can’t be tolerated at any level and for the fact it has been the norm in the industry is appalling.

Bench marking against other worldwide operators
We need to be setting the bench mark - for others to follow - we can’t compete with other third world operations and think we are doing ok - the latest bench mark is ocean cages off the continental shelf in Norway that are totally submersible and there is a mother ship on location to feed and service the pens. - If you are really going to real about this industry and brand Tasmania - We need to do it right from the start - be proud and oncost the product to the consumer - people only eat Tasmanian salmon because they think it comes from clean waters - This is now not the case and everyone knows it and it won’t go away if we close our eye or bury our heads in the sand.

Compliance and monitoring
This is a must and must be made readily available and open to the public - real time needs to be on every leases site and can also be used for a marketing opportunity if the industry survives the next 10 years. - There will be footage of below the pens come out at election time to show the current destruction that has been allowed to happen and it will be a real shock to some on the fence voters.

Biosecurity / Fish health
You will need to distance yourself from supporting any antibiotic added to the fish or risk being involved in a future class action - the government should come out now and ban the use of antibiotics in all Tasmanian produced salmon - the down streaming of the fish waste into digestible fish oil tablets with traces of antibiotics is the catalyst to this future issue and will force the industry closure in Tasmania if not stopped now. There are works a foot in this area to kick this off. You need
to be strong around this very bad practice and call for a stop now. Warm water and toxic algae blooms will have a marked effect on the industry in the next 5 / 10 years and the only way to control this is to move on shore and totally control the fish environment =limited risk and cost to maintain.

Industry growth
Can’t take place without stopping and taking back control and setting new and closely regulated requirements. We can’t just expand to keep up with other worldwide supplies. We need to set Tasmania up to have a strong point of difference with this product – be the world’s best practice and have it priced accordingly. Be brand Tasmania for all the right reasons and sell it to the high end markets of the world. – The only growth that can be allowed for this point needs to be on shore. Short term pain for long term gain.

Career development
Boat drives and general fed hands, is not were the future is – automation is coming and if you thing this industry will sustain the 5000 jobs into the future you need to think again. With your push for expansion comes more profit for the company’s and more money to be spent on efficacies – effectively reducing the jobs you think will be created. In the next 10 years the salmon industry if still going with only employ half of what it does now. – Any government money that gets spent need to be cast into the long term careers future of people moving the industry on shore. – This way we have the best of both world – first class salmon and wold class wild fishers. Win win we all cash in.

Industry body
This sound like a good idea but there are too many greedy and self-interested parties already established and controlled from outside Tasmania and will never work. What we need is a strong government that will come out and make the call on behalf of all – Tell them this is how it is if you don’t like it you can leave any time. – Tell them that brand Tasmania is what is important to our future generations – we are not an industrial state and never will be. – We are a world class asset that people now want a part of and people now want to see our elected government fight for this as it is the only long term sustainable solution we have. Set the world best standards from within and make everyone that wants to be involved in the future of Tasmanian salmon farming follow them.

Submission 44 – Christopher Massie

I understand the salmon Industry is very important for the Tasmanian Economy
I also strongly believe the overall environment is more important.
I have grave reservations with the governments handling of the industry to date.
One only needs to read through the time line of the industry history to understand there has been significant problems in Macquarie harbour.
Alarm bells also ring when in one statement the government indicates the future of the industry is offshore but at the same time allows Tassal to start farming 800 000 fish in a shallow low tidal pristine area such as Okehampton Bay.
How does this give anyone any confidence the industry is being managed in a correct manner?
As a commercial fishermen I am also concerned about the expansion into so called oceanic areas such as Storm Bay.
Firstly I question what is oceanic ? I believe Storm Bay is what the name indicates, it is a bay.
With over 30 years fishing experience in Storm Bay I believe there is little tidal movement the only benefit is there is more wave action but when the waves come they will be largest when the wind is from the south which pushes any waste North.
Also as the fish farms expand into these areas more fishermen like myself will be displaced last
summer I noticed an increase is seal numbers in Storm Bay. There has to be a choice of local seafood for consumers and a future for these existing fisheries that have been operating and employing locals for over 100 years.
Tassal proposed lease West of Wedge Island poses a significant risk to tradition fishing grounds and Tiger Flathead stocks.
Like David Booth, Professor of Marine Ecology I also hold concerns to how the fish farms can effect the environment and possibly the wild fisheries when excess salmon feed and fish excrement settle below the pens on to the sea floor.

Submission 45

Zones-All coastal zones should be excluded. NW tip of Tas is a popular recreational area and used by commercial fishermen- leave it for the existing users. Storm Bay is a BAY used by existing fisheries, yachts including Sydney- Hobart, commercial and pleasure craft. Storm Bay is not oceanic.
Existing Areas- it is not only biosecurity that needs analysis in existing areas, it is also and more importantly, the health of the ecology.
Tendering- The testing of areas for suitability for farming should be done by an independent body and paid for by the proponent. The proponent will collect data to give them the result they want rather than what is actually the situation. It is like statistical data- it depends how you ask the question as to the answer you will get.
Scorecard- the current 'scorecard' used by the industry has been WWF and ASC accreditation which is worthless because the companies pay money to receive it!!!! How useful is a scorecard? Scientific data will tell the truth if it is collected and presented truthfully.
EPA- So far I can’t trust the EPA with what has happened in Macquarie Harbour. Once again, the data needs to be collected and presented truthfully.
Compliance and monitoring- This has been appalling in the past. Monitoring needs to be audited by an independent body. Huge fines should be applied where not compliant. Too much has has been hidden in the past.
R&D- The companies can pay for their own R&D from levies. They make huge profits. We need money for schools, health and infrastructure.
Biosecurity- A lot of what appears to be classed as biosecurity is actually fish health and environment health. Overstocking in still, warm waters creates a stressful environment for the fish and they become susceptible to disease and attack by pests.
Representative body- more independent scientists, ecologists need to be involved. A sustainable industry is possible with less greed. Continual growth is not sustainable.

Submission 46 – Laura Kelly (Environment Tasmania)

Thank you for the opportunity to comment. Environment Tasmania would like to offer these comments as a contribution to development of a contemporary system of governance for salmon industry growth. Note, we have not participated in the multiple choice questionnaire. Public hearings would be a more acceptable form of public consultations than an online survey that logs participants off after a set time.

The identification of go and no go zones

Environment Tasmania welcomes planning, but it is unclear what process Government has followed to map ‘go’ and ‘no go’ zones. International best-practice identifies coastal uses through an evidence based, bioregional planning process. This process should be led by a panel of representatives from
impacted stakeholder groups including salmon farming, conservation, recreational fishing, commercial fishing, coastal tourism and the sailing community. A robust bioregional planning process would guarantee that the best possible evidence is incorporated into marine farm planning. Representation of impacted stakeholders in a fair and inclusive, evidence based planning process, would ensure the salmon industry the necessary social licence to underpin strong growth.

Failure to undertake a sophisticated planning process that utilises the best possible evidence and engages impacted stakeholders, will limit community buy-in to the plan and fail to deliver the best possible regulatory foundations for industry growth.

Industry reference group

In addition to a best-practice bioregional planning process, inclusion of key stakeholders on the Government’s proposed industry reference group would increase public confidence in allocation of use values and industry monitoring and compliance. Government recognises that sustainability is crucial to the industry’s standing in the community and domestic and export markets. Environment Tasmania recommends that a local, independent environment group is represented on the proposed industry reference group.

Definition of oceanic farming

A bioregional planning process would have entailed development of a clear, functional definition of ‘estuarine’ and ‘offshore’ farming. Environment Tasmania recommends that the government provides a review of the literature which has informed its position on oceanic farming. This briefing paper would provide a valuable foundation for stakeholder consultation on working definitions of inshore and oceanic farming that best serve the Tasmanian context, addressing key issues including site hydrology and distance from shore.

Inshore legacy leases

Government recognises inshore leases fail to provide optimal biosecurity and environmental outcomes. While government has proposed a path forward for improving biosecurity outcomes, the plan in its current form provides no clear proposal for improving environmental outcomes in inshore legacy leases.

Environment Tasmania recommends two possible approaches for remedying environmental damage at inshore leases and the negative impact this has on the industry brand:

a/ a timeframe for withdrawal from inshore leases, with estuarine lease space exchanged for oceanic leases created through an evidence based bioregional planning process.

b/ a review of carrying capacity in inshore leases and development of nitrogen caps which are sufficient to prevent the development of in-lease faecal mounds, beggiatoa mats and serious damage to benthic infauna and endangered species. The level of inshore damage permitted when the industry was developing is no longer acceptable to the community. Given that the industry has increased in size and takes up a larger portion of our south-east marine environment, regulations which allow for all marine life to be killed under pens poses a risk to the industry’s brand.

An Environmental Protection Policy (EPP)

An Environmental Protection Policy would be the most appropriate vehicle for outlining threshold
definitions which guide decisions on site selection and carrying capacity. Environment Tasmania recommends the development of an EPP to guide bioregional planning. An EPP would include an evidence base that informs clear definitions of inshore and offshore farming and thresholds for acceptable levels of impact in relation to baseline conditions for marine farms and land based hatcheries and nurseries.

Land based infrastructure

The plan in its current form gives little consideration to the impacts of land based hatcheries. An EPP should include limits on river pollution from hatcheries and assist the industry to transition to closed-loop systems.

Macquarie Harbour biomass

A review of carrying capacity in inshore leases should include a review of operations in Macquarie Harbour, returning biomass to a level which proceeded the 360 per cent expansion of farming in 2015 and the subsequent deterioration in industry compliance. Adoption of the precautionary principle would prevent further damage to endangered species and costly court proceedings which have impacted confidence in governance of the industry.

Independent assessment of waste capture systems

Environment Tasmania recommends an independent assessment of the performance of waste capture systems prior to Government citing this technology as a positive advancement in the industry. To date there has been no comprehensive or transparent reporting for these systems, with data on the percentage waste captured, water quality and benthic impacts declared commercial in confidence.

Transparent monitoring and compliance

Environment Tasmania welcomes the Government’s commitment to increasing public access to environmental monitoring. At a minimum, we request that this data is presented in a format that enables an independent assessment of compliance with licence conditions – both within the lease area and at 35m compliance points, and at adjacent waters which have been identified as important for conservation and native and recreational fisheries.

Seal relocations

The plan in its current form is silent on the issue of seal relocations. This issue needs to be addressed at a regulatory level prior to further industry expansion. Regulations should require the installation of pens which have been tested and proven to be seal proof. Significant fines should be introduced for breach of these conditions which results in seal relocations.

Automation

The plan in its current form is strong in its commitment to supporting job growth in the industry. One issue that needs to be addressed is increasing automation in the industry and what this means for job numbers and workforce development planning. Given the government’s focus on growing employment in the industry, the growth plan should include a clear commitment to maintaining employment in the industry and retraining any workers whose position is impacted by changes in technology.
A comprehensive workforce development plan for industry growth also needs to address the issue of sustainability, to ensure investment in infrastructure for improving production systems happens in Tasmania rather than offshore.

Industry branding

Sustainability is a key part of industry branding and Brand Tasmania, in domestic and export markets. Environment Tasmania recommends that government support the creation of a sustainable salmon marketing group, adjacent to the industry reference group, which can consider the impact of environmental regulations, sustainability practices and provenance on industry branding.

Strengthening governance

Ø Third party right of appeal. Environment Tasmania recommends impacted stakeholders are granted a third party right of appeal through the Tasmanian Planning Commission (TPC). This will assist in increasing community confidence that the interests of all parties will be represented, whether big or small. Running appeals through the TPC will also assist in aligning Tasmania’s marine and land based planning systems.

Ø Marine Farm Review Panel. Representation of a local, independent environment group on the Marine Farming Review Panel.

Ø Marine Farm Review Panel. Representation of a conservation scientist on the Marine Farm Review Panel in addition to a scientist with expertise in industrial aquaculture.

Submission 47 – no comments

Submission 48

I do not want any more fish farms enough is enough

Submission 49

The Tasmanian salmon industry is already world class, and should be recognised as such. It would be useful for data obtained through environmental monitoring to be more accessible to the public in the interests of transparency and community education. A strategic plan to formalise pathways to work from school-based programs should be implemented. I strongly advocate for the current monopoly on aquaculture training in the state to be overturned to allow for differing options for training and education to be explored in order to better meet the needs of both industry and prospective employees and students.

Submission 50

It appears that Storm Bay is about to become the playground of the salmon farmers. If Tassal is granted a 15 sq km lease west of Wedge Island then it will interfere with commercial & recreational boating between Hobart & East Coast as well as Cruise shipping & Hob-Syd yachts due to the Storm Bay entrance being reduced to approx. 8-9 km wide taking into account Huon Aq. lease off Bruny Is. Any future development in Storm Bay will be highly visible from Cape Roul leg of 3 Capes Walk & National Parks on both sides of the bay. What will the effects be on the Shearwater colony on
Wedge Island from lighting & boat movements be as well as an increasing number of Whale movements that have recently been observed? Will increased boat traffic noise at all hours interfere with White Beach-Nubeena residents lifestyle. Norfolk Bay appears to have a number of "Active’ finfish sites that are not in visual existence, will this be more shallow water farming. I believe that giving "blanket” approval for fish farming in Storm Bay is lazy govt policy & is more about convenience to existing leases at the expense of public access to what is a public waterway

**Submission 51 – no comments**

**Submission 52 – Ian Murphy**

Currently the salmon industry is not sustainable given the 5kgs of wild fish to produce 1 kg of salmon, the use of antibiotics and colouring, the creation of dead zones underneath the nets due to concentrated levels of fish waste and the encroachment and impacts onto existing sustainable fisheries.

The failing by the EPA to protect Macquarie Harbour and other southern sites provides no confidence in this organisation to oversee the industry into the future.

Ongoing unsustainable salmon farming practices may ultimately damage Tasmania's clean, green image.

**Submission 53 – Geoff Baker**

There should be no fin fish farms in shore on our East Coast. It is promoted as a "coastal tourist drive" and your government by supporting Tassal in Okehampton Bay is deplorable. Do the right thing protect it and promote it’s real potential as a world class tourist destination.

**Submission 54 – Andrew Boon**

Dear Sirs,  
My comments on the draft “Sustainable industry growth plan for the salmon industry” relate specifically to the Port Arthur area and to Recherche Bay.  
The current Tasman Peninsula and Norfolk Bay Marine Farming Development Plan shows that the area potentially available for marine farming encompasses the whole of Port Arthur (north of a line between West Arthur Head and Budget Head). I submit that in the new plan, this area should be amended to exclude the possibility of establishing marine farms in areas which would never gain community acceptance (eg Masons Cove, Stewarts Bay, Carnarvon Bay and Safety Cove), in the same way that Adventure Bay has been excluded. Excluding these areas would give us confidence that some degree of consideration had been given to these areas, rather than simply taking a ‘broad brush’ approach.  
In addition, I contend that there is a good case to extend the ‘no-grow’ zone from Budget Head north to the entrance to Long Bay and westward/northward (past Cape Raoul) to meet the ‘Current Under Exploration’ zone south of Wedge Island. This is such a spectacular coastline that marine infrastructure should be excluded to maintain an uninterrupted vista. Given the plans for ‘offshore’ marine farms, a 3-mile corridor would not limit development. It does not guarantee that the Three Capes Experience will not become a ‘count the fish farm pens’ experience, but it would at least maintain the views for water-borne tourism.  
Finally, I have been unable to locate a Marine Farming Development Plan for Recherche Bay, but I see that it is currently an ‘Existing Finfish Farming Area’. Apart from its historical, cultural and recreational significance, Recherche Bay, particularly Rocky Bay, is a major anchorage for fishing and
recreational vessels in bad weather conditions. I have observed fishing vessels sheltering there in storm conditions and dragging anchor; the presence of fish pens in this area would be inappropriate and would represent a major hazard to sheltering vessels in these conditions. I submit that Recherche Bay including Rocky Bay should be a ‘no-grow’ zone.

Andrew Boon
Cruising Yachtsman
Member, Friends of Tasman Island
Occasional resident of Stewarts Bay

Submission 55
Oceanic needs to be defined, its farcical that Tassal say they have "oceanic" areas now at Nubeena and Channel, both areas of water are either defined as smooth or sheltered, hardly oceanic.

Government has dropped the ball with Marine farming, science was incorrect in Macquarie Harbour, enough has been said about that.

Define oceanic, there is currently no "off-shore " fish farm lease in Tasmania

Submission 56 – no comments

Submission 57
I write to voice a number of concerns about the proposed sustainability plan for the fish farm industry.

1. I am concerned that this sustainability plan has at its heart a 2009 Industry vision to increase its profit to $1 billion by 2030. An industry truly interested in sustainability would consider the carrying capacity of the environment first and identify the limits to growth, taking into account the precautionary principle rather than adapting (or not) to discovered errors. This plan appears to give carte blanche to achieving this apparently 'conservative' goal, not by cleverer, more humane methods, but by expanding to utilise more of the coastline, the common wealth of the Tasmanian community and the other species, all important and many threatened, who rely on it.

2. Solastalgia should be recognised and taken into account. Loss of beauty, of the wild, of peaceful unindustrialised waters are psychologically damaging to communities and individuals who identify with the places they live in. This has been missing in the industry's considerations to date and it is important.

3. This planned expansion risks further empowering an industry already perceived to have too much influence over government and to be blinded by profit. It's growth risks harm to other seafood industries, along with tourism and Tasmania's brand of clean and green. Caged fish in polluted, deoxygenated waters are clearly not that at all and it is false advertising to sell them as such. Tasmania's overall economy would be more robust if the sustainability of other industries wasn't put at risk by the expansion of this one.

4. Unless the new regulations support the plan by decreasing the duration of licences, by allowing a strong, impartial regulator capacity to actually close leases when necessary, along with far more rigorous BEMPS covering kilometres not metres, the public is unlikely to have confidence in it.
5. Rather than leaving the difficult issues to business to resolve, the government needs to step up on climate change and build this into the notion of sustainability. It is not okay to allow salmon to be farmed in warming waters - not ethically or environmentally - in the same way that it is not okay to allow developments to be built on coastlines threatened by sea level rise.

6. There needs to be a clearer definition of coastal and offshore. Storm Bay is coastal. Flinders, the Furneaux and King Island are also coastal. The Furneaux are refuges for seabirds already at risk as a result of climate change and loss of habitat on their migratory passages. Bird deaths at farms are concerning as are the apparent impacts of farms on the ecosystems in which they operate. An industry that has acted with impunity where it can easily be observed, is likely to be far harder to regulate in more remote areas.

7. While this industry takes, it does not sufficiently give back to the environment it impacts. A sustainability plan should have an expectation that the industry provides benefits, beyond the economic to the marine environment it operates in and that it absolutely minimises harm. It’s credibility in this regard has been lost to many in the community and the plan needs to address issues of trust.

8. Along with the islands, places of historic and cultural significance like Port Arthur and Recherche Bay should be exempt. Fish farms are leaving less room for boating, and anchorages in many areas the fish farms want to take over represent safety in poor weather conditions.

This plan will need to be rigorous if it is to return to the Tasmanian community an industry we can trust, be proud of and rely on for the longer term, as opposed to one that destroys what is valuable about this state.

Submission 58 – Susan Hood

Re: Grow and no-grow zones. There is already extensive establishment of operations in some parts of the S-East, impacts of which are affecting visual amenity and water quality. Options for potential expansion/exploration in the area have the potential to impact on these same factors, as well as impacts on wildlife and tourism. The impact on the visual amenity in the Nubeena area (Barilla Bay) for instance has been considerable in recent years.

Re: Finfish Farming (Compliance and Monitoring) Unit. Strongly agree that this is required especially in relation to water quality in areas adjacent to fish farms in the S-East (eg Nubeena). With current fish farms impacting on the immediate and surrounding environment, the health of the broader environment is compromised.

Re: Encouraging relevant research and development, and the subsequent adoption of new technologies that reduce environmental impacts. Animal welfare? Nowhere in the proposed plan is there reference to animal welfare (as opposed to animal health).

Re: Development of an industry-wide Biosecurity Program. Disease and pests are an issue because this is another form of factory farming - high density enclosures where fish are confined (as are poultry in battery cages). They suffer as a result. It is critical that if this industry is to continue, that stocking densities at the very least are given the highest consideration over anything else. As more people turn away from the factory farmed product - whether fish, meat, eggs - this is critical going into the future. Consideration should be given to certification such as Freedom Food Certification (RSPCA-UK) based around the scheme’s five principles: freedom to express normal behaviour and
freedom from: fear and distress; hunger and thirst; discomfort and; pain, injury and disease. Not to do so will only undermine the already tainted brand.

Re: Sustainable growth/Industry growth. The sustainability of this industry is compromised by its emphasis on carnivorous fish and the feed requirements from wild caught fish. Feeding on ‘artificial’ feed does not make for a healthy product or enhance the brand. If it is to be successful into the future organic farmed fish status should be considered, as well as non-carnivorous fish. It is totally unsustainable to continue to compromise wild fish stocks to feed farmed fish.

Re: Representative industry body. Consideration should be given to including other representatives e.g. appropriate community and tourism representatives due to the impacts on these stakeholders.

Submission 59 – Diane Lester

Salmon producers suing each other, boycotts by top chefs, sell recommendations to investors, large community protests, negative publicity in national current affairs, dismal science (1), environmental deterioration of iconic public waterways, a cowboy approach to environmental guidelines by the largest producer, fish welfare concerns, small scale fisherman with irreplaceable local knowledge going out of business, a constant and unrelenting stream of letters to the local paper, comparisons with the woodchip industry. This is the current context of salmon farming in Tasmania in which the government is proposing to expand the industry.

Many Tasmanians have links with the coastal marine areas and see the damage salmon farming is causing, including pollution, loss of fishing grounds, loss of fish variety, diseased native fish, loss of serenity, and the degradation of Macquarie Harbour.

I find this Draft Plan out of touch with the community feeling. Indeed, one could be forgiven for thinking it was written by one of the 3 accountants that make up half the board of Tassal, as part of the company’s ‘Right to Grow’ strategy (2).

The Draft Plan is intended to build public confidence in the industry, but being obviously biased, is scary and has the opposite effect. The initial questions on the Draft Plan one must answer show extreme bias. They promise better standards in the industry, but why should we believe this given past performance? Obviously Tassal cares only about its bottom line as illustrated starkly and chillingly by its recalcitrance in adopting seal proof nets, with major consequences for the north-west coast. Ultimately the standards of salmon farming in Tasmania will be determined by cost, so the industry can compete globally if it is aiming for export markets, in particular, and going on past performance, the Environmental Protection Authority will bow to this.

The Draft Plan’s first graph showing gross financial value of industries is misleading because it does not factor in the environmental costs of salmon farming, compared with dairy, beef, potatoes and wool.

What price should be put on our marine environment and ecosystems, including native fish populations, as well as the unique Tasmanian experience of boating and fishing in unspoiled areas? I note the increase in value of the salmon industry shows a very close correlation with the loss of dissolved oxygen in Macquarie Harbour. An industry that degrades the environment is inherently unsustainable.

The Draft Plan says an expanded salmon industry will deliver 'more and better jobs' but makes no projections. It ignores the obvious that economies of scale that will likely deliver fewer jobs in the
future, that automation will replace current jobs and that growth will come at the expense of areas negatively affected by salmon farming, such as fishing and tourism. I note that Tassal's 'Right to Grow' strategy includes automation as a priority (2).

The Draft Plan also fails to mention that the profits from industrial salmon farming will mostly go outside the state to the shareholders of the large companies involved. This has implications for Tasmanians financially and for our social fabric. It is one thing for our environment to be degraded, but for the profits made from the degradation to go elsewhere is another.

The Draft Plan should recognise the risks associated with rapid expansion of an industrial scale monoculture. The latest Tassal report lists 'Norwegian lice infestations' and 'Chilean algal blooms' as fundamental drivers of its growth (2). However, with expansion, Tasmanian salmon producers will undoubtedly be beset by similar problems. Already Amoebic Gill Disease and warming temperatures plague the industry here, denting its profitability. Indeed, its debatable whether salmon farming is actually profitable in Tasmania, because exploiting Macquarie Harbour has made it relatively cheap in the past, where AGD is not a problem. Warming waters now and in the future further challenge its profitability and risk the sudden loss of company assets (ie fish dying). The government should be concerned with risk management.

The recent move into Okehampton Bay by Tassal suggests desperation as the salmon are unlikely to do well longterm in these warmer waters (3) and the farm will be despoiling an iconically beautiful place in Tasmania, with massive tourism potential just one hour's drive from Hobart. This is the sort of thing that would only happen in third world countries (with due respect to third world countries) and made me feel cynical when trying to answer the questions as part of this submission.

I am not satisfied the Environmental Protection Authority is adequately studying the affects of the fish farms on marine ecosystems. A scientific study found disease in native fish near fish farms (4), but I can't find recent studies in this vein. As a qualified scientist, I am generally disappointed with the work of the EPA, particularly in relation to Tassal. It is hard to believe the government is not favouring Tassal (presumably bowing to the company's 'Right to Grow' strategy), which in itself is creating a really bad look for the industry.

I don't understand what the Draft Plan means by the term 'biosecurity'. Is it worried about disease for the salmon only, or native fish as well?

Anyone who has travelled outside Tasmania will know that unspoiled places are increasingly rare. Indeed, this accounts in large part why we are enjoying the current boom in tourism (worth hundreds of millions of dollars a year). Everyone is talking about the 'Tasmanian brand'. Why put it at risk?

Remaining unspoiled is where the future of Tasmania lies. A visit to Uluru shows how a natural environment and lack of commercialisation can be an enormous drawcard — indeed, they're things many people crave.

The reality is that Tasmania is too small and beautiful to become an industrial fish farm to supply China (as Tassal is proposing). It will never compete in scale with Chile, Canada and Norway because it does not have the stretches of cool coastal waters that make industrial salmon farming economically viable. Besides, Tasmanians from all walks of life are bonded to their marine environment and will not let this happen without a massive fight as is already evident. Any conflict will be damaging to the state and affect our brand. Many international and interstate visitors witnessed the FloatMo protest in Hobart and it made national news.
The government should encourage smaller scale premium food products with high profit margins. These agricultural industries, together with tourism and sea/tree-changers will support jobs in vibrant and innovative regional communities that are truly sustainable and appreciate our environment, rather than trash it.

The salmon industry should stick with mainly supplying domestic markets and try to keep its product at premium level, rather than going low quality, high volume for Asia (I rarely eat salmon these days because I find the recent farmed product oily, mushy and coarsely flavoured, which no doubt is a result of the 'improved' growing methods.) One of the reasons financial analysts advise investors away from salmon producers is because prices on the international markets are subject to vagaries (5) and Tassal itself admits its production costs are currently higher than the global average.

Notes and References
1. With the notable exception of the 'IMAS report' (Ross J and McLeod C 'Environmental Research in Macquarie Harbour' (2017)

Submission 60 – Claire Gilmour

--- The following needs to be taken into consideration when developing a Tasmanian Salmon Farming plan in (but not limited to) Far N/W Tasmania.
According to DPIPWE’s report titled –
It says – “The plan does not propose the culture of finfish.” So what has changed?
Regarding the Seagrass beds (juvenile fish nursery) adjacent to the proposed Salmon Farming area near 3 Hummocks, it says – “… it remains one of the most important seagrass beds close to Tasmania.”
Regarding Migratory birds – “The plan area falls within one of the most important migratory wader sites in Tasmania as it provides the most extensive feeding grounds on an important route for birds migrating across Bass Strait. The area is also very significant habitat for non-migratory species. In recognition of its importance as a bird habitat area it has been placed on Interim List for the National Estate Database which binds Commonwealth Departments.”
“Eleven species of birds listed as rare or threatened in Tasmania have been recorded in the area.”
“The area is also subject to two international agreements dealing with migratory birds. These agreements are the Japan-Australia Migratory Birds Agreement (JAMBA) and the China-Australia
Migratory Birds Agreement (CAMBA). Both provide a degree of co-operation between the contracting parties and protect migratory birds by controlling hunting, encouraging joint research and establishing sanctuaries preserving and enhancing the environment of migratory birds."


Look up State Coastal Policy 1996.

--- How does the Salmon Farming plan propose to deal with the following? ...
According to the report - “Circular Head Region Coastal Foreshore Habitats; Sea Level Rise Vulnerability Assessment (2010) final report for the Cradle Coast NRM Region and the Cradle Coast Authority.
It says, as quoted ...
“if sea levels continue to rise as predicted, the most likely and significant impacts that have economic and social implications include;
- Changes in shoreline position as the foreshore profile responds to sea level rise including coastal erosion
- Coastal flooding of low lying privately owned land
- Seabed instability with associated decreases in water clarity
- Changes in water quality through reduced filtering and sequestration of nutrients and sediments by habitats
- Changes in primary productivity of the habitats and an associated reduction in food security benefits
- Reduced carbon sequestration rates and possible loss of large carbon reservoirs.
- The resilience of the habitats’ natural capacity to respond to sea level rise is affected by pressures other than sea level rise including:
- Excess nutrients and sediments, eg eutrophication
- The areas provide habitat for a range of fauna, some of which are commercially important (e.g. abalone and rock lobster) while others are important for biodiversity conservation (e.g shorebirds).
The Boullanger Bay-Robbins Passage wetlands are known to have the largest diversity and density of resident and migratory shorebirds in the State. Over 25,000 shorebirds have been recorded in the summer months, suggesting that the area supports more shorebirds than the rest of Tasmania combined (Spruzen, 2008) The area provides habitat for 15 bird species listed under international migratory bird agreements and two resident species, little tern and hooded plover, listed as endangered and vulnerable respectively. The area is home to large populations of the rare saltmarsh herb Limonium austral (listed as Rare under the State legislation) and extensive tracts of saltmarsh dominated by the succulent shrub Tecticornia arbuscula, which is a structurally dominant vegetation in Tasmanian saltmarshes.
The rich and unique natural values in the area have been identified through its listing in the Directory of Important Wetlands of Australia (Ref. No. TAS089). Tasmania has 89 wetlands in the list and this area is the only one to fulfil all six criteria for listing (Environment Australia, 2001). The area is on the Register of National Estate (Place Id. 19961) for its natural values, mainly including the shorebirds, saltmarshes and tidal flats. This area fulfils several criteria for being considered as a Wetland of International Importance under the Ramsar Convention of Wetlands (Dunn, 2000, 2001). However, the nomination was reject by the State government following local opposition to the listing (Prahalad and Kriwoken, 2010).
2.1.4 Protected Environmental Values
Protected Environmental Values are set under the State Policy on Water Quality Management 1997
to define the current uses and values of waterways in Tasmania. PEVs are being set around the State for all surface waters, including that of the Circular Head foreshore area which mainly includes estuarine and coastal waters (DPIWE, 2000). …the three that are of relevance to this study are;

- Protection of Aquatic Ecosystems (ensuring the healthy function of the unique and wide range of aquatic wetland habitats in the area);
- Recreational Water Quality and Aesthetics (maintaining the water quality required for recreational pursuits and general aesthetics);
- Industrial Water Supply (supplying clean water for fishing aquaculture and tourism industries in the area).

2.2 Management objectives and strategies

Of particular relevance here is the Outcome 1.1.9 of the policy (Tasmanian State Coastal Policy 1996 (revised twice in 2003 and 2009), which states that “(i) important coastal wetlands will be identified, protected, repaired and managed so that their full potential for nature conservation and public benefit is realised. Some wetlands will be managed for multiple use, such as recreation and aquaculture provided conservation values are not compromised.”


--- In addition, Salmon Farm pens should be considered ‘Commercial vessels’ and therefore adhere to such as the following ...

41. Disposal of sewage and other wastes from ships and boats

41.1 Within Tasmanian waters, raw sewage disposal and other waste disposal from ships and boats should be prohibited wherever this practice has significant potential to adversely affect water quality objectives, including:

2. from any commercial or recreational vessels in waters where protected environmental values are: A. Protection of Aquatic Ecosystems (i) Pristine or nearly pristine ecosystems (ii) Modified (not pristine) ecosystems (a) from which edible fish, crustacean and shellfish are harvested

42. Marine farming

42.1 Areas designated for marine farming should be chosen such that marine farms are sited and can be operated to provide sustainable environmental outcomes.

42.3 Marine farming operations should be managed and regulated as required to ensure that they do not prevent the achievement of recognised water quality objectives outside of the marine farming leases.

--- Of particular relevance, please note the following should be adhered to ...

Part 5 Monitoring

45 Responsibility for monitoring

(d) Community-based monitoring organisations should be incorporated into monitoring programs wherever practical.

47. Public access to data

47.1 Information on the quality of public water resources should be publicly available, and the State Government should facilitate appropriate mechanisms to achieve this objective, including the provision of regular public reports.

48. Use of monitoring data

48.1 Water quality data should be used by resource managers, other decision makers and the community, to, review the extent to which water quality objectives are being achieved, and where they are not, to devise strategies and programs the achieve objectives.
According to the Tasmanian Government ...
“The Government determined its selection of the grow and no grow zones in this draft Plan by carefully weighing up three important considerations:

. Firstly, by obtaining and incorporating advice across government and industry about the areas where marine farming would be suitable or not suitable for basic biophysical and environmental reasons;

. Secondly, by talking to the industry about its plans and the waters where it considers it needs to go in order to achieve sustainable growth with good environmental and biosecurity outcomes; and

. Thirdly, by listening to the concerns of the community about where they felt that marine farming was not appropriate, for reasons of amenity and alternative use.

SO – what that says is … firstly and secondly the government and industry are in bi-lateral physical/security pursuits …

In layman terms … that means government funded organisms will filter your money through to their preferred businesses/donators to pursue … LYING – because thirdly never happened to produce the so called grow zones!

I personally challenge the Government to prove the so called ‘grow zones’, such as in the Circular Head District, had community input in their Salmon Farming Plan.

The “Grow Zone Plan” Salmon Farming Plan in far North West Tasmania is a con!

And I will prove it!
I ask specifically for my self, Claire Gilmour and or Matthew Morgan, as his nominated spokesperson/secretary in this regard to be given the opportunity to talk publicly with the government on and all issues regarding the proposed salmon farms in the far North West Tasmania.

Claire Gilmour

Submission 61 – Christopher Knight

Having read the plan I find it flawed in s much that there is little focus on the biomass waste that is a consequence of concentrated farming practices even at sea. With large numbers of fish held in fixed locations the waste generated on the sea floor is not it seems an issue. My thinking is that it is a wasted resource and by deploying a scavenger venture system could be bought ashore for treatment to remove nutrients as used in Queensland prawn industry as per Richard Flanigans program on global warming and seaweed production, surely with all industry the best practice is a closed loop method which I visualize as possible if existing technologies and some innovation are utilised I is my belief that all industry must address their waste as a responsibility of practice and also the unassailable role of government and the community at large to monitor with transparency, profit at all cost to the environment both now or in to the future should not be the criteria by which business operates. The evidence is to be seen as a consequence of the ever moving colossus called
the salmon industry which have left nothing but dead zones in their wake, change this by ensuring the waste is collected and reused, it seems a clear choice. thank you for your attention regards Chris Knight

Submission 62 – Peter Meloy
I do not agree with the plan's stated objectives. Where is the consideration of the industry's impact on other uses and qualities such as tourism and scenic impacts. The plan makes a false comparison of the monetary value of the industry against industries such as dairying even though these industries are unaffected by and not competing against salmon farming. What about comparing this industry to tourism and see what importance it then has in relation to an industry that directly competes. This plan identifies the d'entrecaustaeaux. Channel as an existing grow zone that will continue. I'm unaware that this was ever publicly agreed to but one of Tasmania's most scenic and important recreational waterways should have all farms progressively moved to either on land or into deep water and should be done quickly. The farms are a blot on the landscape and I wonder at why government has previously sought to use one of it’s most important tourist assets for what is essentially intensive animal feedlots on an industrial scale. I support all proposed "no grow" zones but do not support new areas unless they are in deep water, well away from the coast or on land. Thank you for the opportunity to comment.

Submission 63 – Christine Coughanowr (Derwent Estuary Program Ltd)
On behalf of the Board of the Derwent Estuary Program, Ltd, I offer the following feedback on the recently released Sustainable Industry Growth Plan for the Salmon Industry.

The Derwent Estuary Program (DEP) is a partnership between government, business, scientists and the community to restore and protect our waterway. Established in 1999, the partnership has been nationally recognised for excellence in reducing water pollution, protecting nature, monitoring river health and promoting greater use and enjoyment of the Derwent. In 2010, the DEP was awarded Australia's most valuable prize – the National RiverPrize.

Our major sponsors include: Brighton, Clarence, Derwent Valley, Glenorchy, Hobart and Kingborough councils, the Tasmanian Government, Nyrstar Hobart, Norske Skog Boyer, TasWater, TasPorts and Hydro Tasmania. Since March 2017, the DEP has been operating as a registered company, with an independent board.

The Derwent estuary lies at the heart of the Hobart metropolitan area and is home to 40% of Tasmania’s population, as well as a major centre for commercial, industrial and tourism activities. The estuary has a long-standing history of heavy metal pollution – with some of the highest reported levels of zinc, mercury and lead in the world. In recent years, there has been significant investment to reduce metal inputs by both the zinc smelter and the state government, with considerable success. However, the legacy pollution in the estuary sediments will require careful management for many years to come.

More recently, the estuary has shown increasing signs of nutrient stress, including nuisance algal blooms, sea grass loss and persistent low oxygen levels in some areas. Previous research has shown a strong link between nutrient loading, low oxygen and release of heavy metals from sediments. Therefore, a key element of our long-term management strategy for the estuary is to manage and reduce nutrient loads, particularly during summer months, when the risks are highest. The marine
waters of Storm Bay and the D’Entrecasteaux Channel drive the overall circulation of the estuary, and set the background nutrient levels for the system as a whole.

We note that the Sustainable Industry Growth Plan for the Salmon Industry identifies a large area of Storm Bay as being ‘currently under exploration’ and another section as ‘potential for further release’. Significant expansion of salmon farming in Storm Bay has the potential to generate large nutrient loads, relative to those currently discharged to the Derwent from sewage and industrial sources. It is important that expansion of salmon farming in Storm Bay does not result in further nutrient stress on the Derwent, including heavy metal-related effects.

We therefore request that the Derwent estuary be included as part of any environmental impact assessments for the expansion of salmon farming in Storm Bay and the Channel, including modelling and baseline/performance monitoring. The DEP has considerable long-term monitoring data and scientific expertise that could be contributed, and we ask to be included in the design and review of any relevant investigations, models and monitoring.

Furthermore, freshwater hatcheries and smolt grow-out facilities can also produce high nutrient loads if not carefully managed. There are already seven of these operating in the River Derwent catchment above New Norfolk as well as several unoccupied leases. As part of the Sustainable Industry Growth Plan for the Salmon Industry we ask that all existing and future facilities of this nature be managed in accordance with Best Available Technologies to minimize nutrient loading and associated risks to the River Derwent and estuary.

Finally, we note and very much support the proposal to incorporate regular and transparent environmental monitoring and reporting, via an independent portal hosted by IMAS. This is essential both for the DEP as well as the wider community.

Yours sincerely,

Christine Coughanowr, CEO

Derwent Estuary Program Ltd

Submission 64 – Denis Edwards (Anglers Alliance Tasmania)

This is more a marketing document for the industry rather than a sustainable plan, disappointingly very light weight. Questions have been carefully selected and designed to elicit a positive response.

With the salmon industry doubling production by 2030, the elephant in the room for freshwater anglers is the environmental performance of hatcheries on inland waters and how their already poor performance can be monitored and improved to cope with the doubled production load.

Submission 65

Increased fish farming will significantly increase the amount of water traffic and noise in what are currently peaceful coastal areas

X Strongly agree
O Agree
O Neutral/Not sure
There will be increased navigational hazards due to fixed marine fish farming infrastructure

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

There will be increased navigational hazards due to poorly marked towing of very large fish pens

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

There will be the potential for increased navigational hazards due to increased floating fish farm debris, such as plastic pipes, stray floating structures and pieces of floating rope, despite a government decree of zero tolerance of fish farm debris

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

There is the potential for a significant impact on abalone, lobster and other fisheries in Storm Bay and other southern coastal waters

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
Fish farms should be clearly and accurately marked on nautical charts.

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

Fish farm leases should be clearly marked with synchronised flashing lights

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

Tow vessels and towed fish pens should have visibility on AIS systems

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

Oceanic fish pens should be marked with AIS beacons

X Strongly agree
O Agree
O Neutral/Not sure
O Disagree
O Strongly disagree

There should be greater engagement of industry and government with local communities and community groups when potential new fish farming lease sites are being investigated

X Strongly agree
Tassal should never have been permitted to farm salmon in Okehampton Bay

X  Strongly agree

Inshore fish farming areas should be stocked at lower rates and fallowed more frequently as the industry expands offshore

X  Strongly agree

There is, ultimately, a limit to the expansion potential of fish farming in Tasmanian marine waters

X  Strongly agree

**Submission 66 – Jennifer Hadaway**

If control of improved transparency and accountability of regulatory functions is handed to the EPA how will it be seen to be independent?

The above questionnaire does not answer who, how when and where will there be tests and how will information be provided to the general community assuring it that the tests and results are both valid and applicable to the moment?
The intent in the first section to "maintain public confidence in the salmon industry" raises the question: in the sustainability of the industry or the regulation of it or both?

This should be clarified.

Any finfish and government agreement, e.g. Macquarie Harbour 2018 should be subject to a transparent and independent assessment widely publicised and readily available.

A compliance and monitoring unit cannot be independent if funded by industry levies. Conflict of interest has to be removed here.

All co-funding for this industry between government and the salmonid growers must be seen to be effectively applied and transparently assessed and the results available to the general public.

Disappointing to see the recommendation that "the release of this plan will bring together a representative body of growers, ancillary industries and the scientific community" with no intent to include any representatives from the general community.

A last example of much talk and limited intent by this government.

Submission 67

I strongly disagree with further expansion into prime commercial fishing zones around the Furneaux group, Okehampton and 3 Hummock Island. I believe that large scale industrial sea farming in these areas will ruin these productive fisheries and I am completely against these areas being developed for Salmon farming

I also support de stocking inshore areas to slow the sea bed to recover

I would like to see fish waste management procedures put in place on all inshore leases to minimise the effluent that builds up around inshore leases

I would like to see complete impartiality in regulating the Salmon Industry. The EPA is not impartial. It is closely associated with the current State Government is is influenced by pressure from Salmon growers.

The salmon industry has expanded very quickly before proper environmental/ socio assessments have been made. This does not give the Government or Salmon growers a mandate to start expanding into new areas. It should be the opposite until real long term effects on the environment have been measured.

Submission 68

The plan is more akin to an advertising brochure for the industry than a “plan”. In places it reads rather like an Eastern European manifesto. It is vague and general. It doesn’t justify the map of grow & no grow areas. It includes inshore areas in the grow areas, despite indicating that there will be a move off-shore. There is not enough attention to the environment, on protecting the marine and coastal environment from damage and, importantly, remediating past damage.

Vision

Reword second para, many Tasmanians are not proud of the present salmon industry, or parts of it. The Vision should read: “Be an industry that Tasmanians are proud of....”
Third para: the aim to be the most environmentally sustainable in the world is to be applauded and should be matched with "improved environmental standards, monitoring and regulation" rather than the bland "appropriate...."

p.5 Essential element: Reword - “Establish public confidence....” . Since the beginning of the industry and the choking of the Channel with fish farms, locals and old timers have complained about the degradation of the waterway, impact on recreational fishing, sludge on the bottom & shores, debris, etc etc. Recently Tassal has suffered considerable brand damage, mainland friends say they won’t purchase Tassal. Hobart’s premier fresh fish seller on the docks, Mures, sells Huon salmon, clearly labelled and with supporting information. This was not the case a year or so ago.

Also should identify areas where reduced farming is to occur.

Agree with commitment to future expansion into oceanic waters. Therefore, the map should not show any inshore waters as potentially available.

Tasmanian Industry scorecard – only refers to international good practice, a step down from the vision. Tasmania should aim to lead, not just “be abreast of ” international standards.

Supporting industry growth – this is main message repeated, indication of “strong support” for the industry shows the difficulty of being an industry promoter and regulator. This survey refers to Government support for the industry as long as the high standards & expectations of this plan are met - however, these standards are not clearly defined in this plan.

There should be a 4th priority action – concerning remediating past damage to the environment and avoiding further damage.

p.6 Snapshot, text & graphs

The growth in production and fast progress toward achieving $1billion industry suggests that growth has been a bit too rapid and that it has been achieved at the expense of the environment. The increase in production in Macquarie Harbour would have been largely responsible for the growth in overall production since 2012 & hence the increase in total value of the industry has been achieved by polluting the environment, creating bacterial mats and dead zones under some pens in the Harbour, impacting the Tasmanian Wilderness World Heritage Area. The Snapshot indicates that there is a danger that Tasmanian salmon will come to be seen as a mass produced product, of lower status. There is already an indication that industry management is not in line with the Clean, Green & Clever Tasmanian Brand.

Macquarie Harbour agreement - it is not clear what the purpose of this is, what "an agreed and workable" solution is. The Harbour stocking rate is likely still too high.

The industry 2009 target is to double to $1 billion by 2030. This may be acceptable if the rate of growth is slowed, all new development is well off shore and there is an emphasis on environmental protection.

The Map

The “No grow” areas are supported but must be more expansive. The potential” grow” areas should not include any inshore areas (ie not adjacent to King Island, East Coast Flinders, Cloudy Bay and South Bruny National Park, the surf beaches on South Arm Peninsula. Grow areas adjacent to terrestrial reserves should be sufficiently distant that the shore of the reserve is not impacted. The Okehampton lease should be revoked for fin fish. No new “grow” areas should be established until
marine protected area requirements have been determined and established for all of Tasmania’s marine bioregions.

Submission 69- no comments

Submission 70

The potential for any expansion of marine farming (pens and related shore facilities) associated with growth zones in areas of high scenic and conservation value would be most inappropriate. Leveraging "brand Tasmania" requires a sophisticated understanding of the visual and cultural values that drive a positive tourism and export market sentiment. Maintaining local community as well as external social licence for activities such as marine farming is critical.

The environmental considerations in the draft plan that propose moving to offshore rather than estuarine and sheltered waters marine farm developments are appropriate. However, the plan is seriously deficient as it does not explicitly require areas of substantial scenic, wilderness and tourism value to be protected from marine farm development.

I particularly draw attention to the east coast of Bruny Island, the Cloudy Bay Area and Cape Bruny coastal waters. These are key sea scape areas with marked tourism and cultural significance to "brand Tasmania" that risk being substantially degraded if marine infrastructure (pens, et cet) were to be placed within sight of shore. The significance of this land and seascape is highlighted by the surrounding National Parks and the increasing development of an ecotourism industry that leverages off the wild and untouched appeal of Bruny Island’s marine and coastal vistas.