***Working draft 13 May 2022***

**10 YEAR SALMON PLAN INITIAL RECOMMENDATIONS**

**The Tasmanian Independent Science Council (TISC) offers the following early response to the**

**Tasmanian Government’s new 10 Year Salmon Plan**

As a basis for meaningful and informed consultation, the TISC seeks answers to the following ***questions***:

* The Government’s **vision and guiding principles are seriously flawed**, and we see no reason to use these as a basis to frame our input. Many aspects are open to interpretation (e.g. ‘no net increase’ and ‘moratorium’), enabling industry to carry on with both business-as-usual and planned expansion. ***Is there an opportunity to modify these, taking into account the feedback received through the consultation process?*** The TISC is developing an alternative vision and principles, and plan to target our advice accordingly.
* There have been **multiple external reviews** conducted over the past 2-3 years that must inform this debate and have **not yet been released** to the public. These include the final report from the Legislative Council Inquiry, the Cawthorn Institute review of international salmon legislation and the Scottish Association for Marine Science BEMP reviews for three marine farming regions. ***When will these reports be released?*** Other important legislation is also missing in action (e.g. the Environment Legislation - Miscellaneous Amendments Bill 2019) or is currently under review (e.g. Living Marine Resources Management Act 1995)
* The **timelines are far too short** for any meaningful consultation if the intent is still **to implement the new plan from 1 Jan 2023**. ***Is this still the plan?*** If this is a genuine effort to engage with and respond to community concerns, we strongly recommend the timelines be extended – along with a genuine moratorium on any further production on biomass. This moratorium must apply to additional biomass as well as lease area (not ‘net lease area’).
* ***How will the feedback received be compiled and responded to?*** It is essential that all written input be compiled and published as a public document, not a generic ‘high-level summary’.
* ***Who will actually determine what goes into the new 10-year plan? Is there a formal working group tasked with this, and if so, who is on it?***

**An Alternative Vision** *(needs further work)*

Healthy marine and freshwater environments underpin everything else, and must not be degraded by salmon farming.

**Alternative Guiding Principles** *(also need further work/consolidation)*

1. Precautionary principle – current and future production must not exceed carrying capacity, put protected species at risk, or otherwise damage the environment
2. Robust scientific understanding must underpin decision-making and include comprehensive baseline surveys, modelling, monitoring and timely/transparent reporting. This work must be undertaken by unbiased and independent scientists with no direct ties to the industry.
3. Strong & independent regulation
4. Community consultation and support, including provision of regular, timely and transparent information
5. Provides substantial economic benefits to state and community
6. Includes all aspects of production, including freshwater, well boats and desalination plants.

**Key issues**

Salmon aquaculture in Tasmania has expanded too far and too fast over the past decade and has overtaken the science and regulatory systems needed to underpin sustainable production. Many are concerned about the visible degradation of coastal ecosystems, impacts on recreational fishing and protected species, noise, lights and visual amenity, marine debris, etc.

Further expansion onshore or offshore requires further planning and investigation (environment, socio-economic), along with clear policy and operational guidelines. This must start with genuine marine spatial planning that incorporates all sectors. Any onshore or offshore expansion should be accompanied by a reduction in coastal operations, starting with those areas most poorly suited to intensive aquaculture.

Other major issues include

* Poor communication and transparency
* Poor community consultation and engagement leading to a lack of trust
* Regulatory standards and systems have not been finalised; regulators are slow/reluctant to act
* Science is largely industry and state government funded (real or perceived bias) and has not caught up with expansion
* Rivers are polluted by flow-through hatcheries and freshwater is extensively used for bathing fish at sea
* Climate change is reducing the viability of salmon farming and there is no clear strategy to address this. Will salmon be replaced by another species (e.g. yellow-tailed kingfish), and what is the implication of this

**Actions needed**

1. A genuine moratorium on biomass (not net area) is needed until existing operations have been reviewed and adjusted to ensure sustainable production that does not damage our environment, supports long-term employment and revenues to the state, limits biosecurity risks, etc. We suggest that a period of 3 to 5 years may be needed for this.
2. Destock/reduce biomass levels in nearshore operations, particularly those with limited flushing and/or high ecological values (e.g. Long Bay, areas of Macquarie Harbour, Channel/Huon and Okehampton)
3. Undertake a detailed and unbiased review of both land-based and off-shore production options. If offshore/land-based production is approved, this should be progressed alongside a parallel reduction of nearshore operations
4. Establish an independent funding mechanism to support the science that is needed to underpin genuine sustainable production
5. Scientific investigations are needed to address the following key gaps:

* Multi-sector marine spatial planning, including all regions of the state and current lease areas, as a basis for future operations
* Comprehensive baseline surveys (to be repeated every 5 years)
* Carrying capacity modelling and precautionary limits
* Monitoring and management of protected species
* Predicted impacts of climate change and how this can be managed

1. Undertake genuine community consultation, including the provision of regular, timely and transparent information. Annual environmental reports should be prepared for all regions and presented to the public at an annual workshop. These should include monitoring results, operational context and future plans. The Salmon dashboard tool requires major improvements – ‘compliant’ is not a meaningful indicator
2. A Fully independent EPA is needed to set standards and to monitor and enforce them. It is unclear how the newly independent EPA is significantly different from the previous version, as it has the same Board, same Director, same staff and appears to be operating under the same systems.
3. Regulatory standards must be finalised, and include input provided through this consultation process. Standards should include lease-specific limits on production and more comprehensive monitoring and management criteria (including nuisance algae). Discharges from large well-boats and desalination plants should also be regulated by the EPA
4. Unbiased economic assessment of costs and benefits of salmon aquaculture, and how this can be optimised for the benefit of the state and affected local communities. This should include improved financial transparency, an analysis of jobs, implications of continued automation (particularly with offshore production), adequate fees to ensure full cost recovery of management and science, possible auction of production quota/leases, payment of royalties or Gross Product Value fees, payment of Council rates, rehabilitation bonds, etc.
5. Clarity is needed about current and future water requirements for producing and bathing fish, and how these can be provided without adverse impacts on community supplies or the environment
6. All freshwater operations whether for smolt production of full-scale production should be Recirculating Aquaculture Systems (RAS), and clear design criteria must be established to define this.
7. Flow-through hatcheries should no longer be permitted in Tasmania. A policy and sunset clause are needed to convert current flow-through operations to RAS within no more than 3 years. Flow-though hatcheries that discharge polluted water should no longer benefit from trivial non-consumptive water allocations fees ($412/yr)