Mr Wes Ford,
Director Environment Protection Authority Tasmania
40 Elizabeth Street
Hobart TAS 7000

Tasmanian Independent Science Council
info@tassciencecouncil.org

18th January 2025

Re: Follow-up on Long Bay pollution by salmon farming

Dear Mr Ford,

The Tasmanian Independent Science Council continues to have a number of concerns about the poor condition of Long Bay as a result of the continued salmon farming operations there. As described in detail in our previous letter and report of 11 July 2023, we believe that Long Bay is not a suitable location for finfish aquaculture due to its shallow and poorly-flushed morphology.

The lease continues to be occupied by a double row of 120m diameter pens (sixteen in all), and in early November 2024 was stocked for a seventh annual cycle with large smolt for eventual transfer to Tassals Okehampton lease.

In 2023, the Environmental License (EL) for the Long Bay lease was rolled over for another two years (until 30 November 2025). In addition to the annual BEMP monitoring set out in the EL, the EPA imposed a number of additional conditions under the Tasman Marine Farm Development Plan, including:

- A Total Permissible Dissolved Nitrogen Output (TPDNO) cap of 48 tonnes per 12 month period
- Additional reef monitoring (both periodic transects and biannual Rapid Visual Assessments)
- Additional water quality monitoring

Despite the stated 20% reduction in TPDNO inputs, the bay continues to show signs of eutrophication, with reports of extensive filamentous algal blooms by the community and damage to seagrass beds. A recent inspection of the bay via kayak on 13 Jan 2025 confirmed the poor condition of shallow seagrass beds, along with a likely filamentous algal bloom at depth over substantial areas of the deeper seaweed and reef communities. Furthermore, there have also been periodic reports of salmon mortalities, antibiotic use, frequent bathing, and oxygen augmentation over the past two years, indicating poor conditions at this lease for fish health.

To date, none of the routine BEMP reports, or reports for the additional required monitoring, have been posted on the EPA website since the TPDNO cap was implemented in 2023. The most recent BEMP report dates from 2021/22, i.e. more than two years ago.

Can the EPA please provide an update and summary on the environmental conditions in Long Bay over the past few years? In addition, we are seeking information/documentation on the following:

- BEMP reports for 2022/23 and 2023/24
- Results for the reef monitoring (transects and RVAs) and additional water quality monitoring, if not included in the above BEMPs
- The reported TPDNO inputs to Long Bay over the 2023/24 cycle, and confirmation that the 48t TPDNO cap was not exceeded.

- Findings of the EPA's review of the TPDNO cap that was conducted in July 2024, according to the EPA website
- The methodology used to calculate the TPDNO inputs
- Any reported mortality events, antibiotic use and escapes at the lease site since 1 Nov 2023.

As set out in our previous letter (July 2023), we believe that the in situ sensor monitoring that was conducted by the EPA is essential to better understand nutrient and oxygen dynamics in the system, along with a nutrient response model to set a meaningful nitrogen cap for this poorly flushed system. If there is an intent to extend the EL beyond 30 November 2025, we would ask that this additional monitoring and modelling be implemented over the next 6 months.

We would also strongly recommend that the EPA investigate the algal bloom that appears to be developing in the bay over the next few months.

I look forward to your reply

Sincerely

Christine Coughanowr
Co-chair Tasmanian Independent Science Council

cacoughanowr@gmail.com

cc Darryl Cook, EPA