

16 January 2023

The Tasmanian Independent Science Council
Hobart, Tasmania

The Honourable Jeremy Rockliff MP
Premier of Tasmania

Dear Premier,

Tasmanian Independent Science Council - Response to the Draft 10-Year Salmon Plan

We are writing to you directly, as the vast majority of our previous input and recommendations have been ignored and not incorporated within the draft 10-year Salmon Plan. We are concerned that continued efforts to participate in the formal process will not only be in vain but will be used to imply that we have been 'consulted' and presumably listened to. Einstein once said: *'Insanity is doing the same thing over and over and expecting different results'*. As such, we are hoping that a more direct approach may result in a different and better outcome.

The Tasmanian Independent Science Council (TISC) is composed of scientists and related professionals who provide independent and impartial advice, with a focus on policy and planning reforms of significant State interest. Our members include scientists with expertise and decades of experience in marine and freshwater ecology, threatened species, aquatic chemistry and water quality, environmental management and pollution control, climate change and economics.

Collectively, we have spent thousands of hours over the past five years contributing to the on-going debate about salmon production in Tasmania. This includes as motivators and participants in the Legislative Council salmon inquiry, as participants in the Storm Bay expansion planning process, in the review of various Environmental Impact Assessments, Environmental Licenses, Broadscale Environmental Monitoring Program reports as well as multiple other scientific studies. Most recently we have participated in all aspects of the 10-Year Salmon Plan consultation process.

As independent scientists, we are well-informed and we support a salmon industry that is genuinely and demonstrably sustainable and one that we can be proud of.

Unfortunately, this is not currently the case. The industry has grown too fast over the past ten years, without the necessary independent regulatory, scientific and biosecurity frameworks in place. This poorly regulated expansion is placing unreasonable stress on coastal and freshwater environments and communities. The financial return to the state is poorly documented and appears to be pitiful, compared to other parts of the world. While the community is currently being consulted ad nauseam, their concerns are not being heard or addressed.

Until these critical issues have been resolved we strongly recommend a moratorium (halt) on further salmon growth in Tasmania's marine and freshwater systems, together with an audit and risk assessment of current operations.

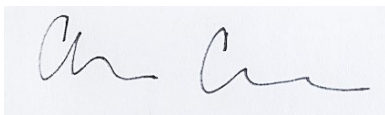
The issue of greatest concern to the community is that of existing leases in sheltered waterways, and the potential that these will be expanded further into new areas. The vast majority of published submissions (including over 170 from Flinders Island alone) have demanded a reduction in, or removal of, existing nearshore leases. Despite this, the draft Plan and the responses given at community briefing sessions imply that existing leases will be retained, and that new leases are likely to be approved in nearshore areas. If the Plan genuinely seeks to respond to environmental and community concerns, this issue must be clearly and openly addressed.

The Draft Plan proposes to review fees and charges to ensure full cost recovery and an appropriate return to the Tasmanian community. This is long overdue. An earlier review was announced in 2021 to consider the cost of services provided by the Government to regulate and support the industry, with input from the Treasury. If the industry is to obtain a social licence, it is imperative that the findings of this review are publicised and made available for comment. Of particular importance is the classification of fisheries research subsidies. Research supporting the Tasmanian salmon industry is not 'Public Interest' research – it is industry support and must be included in the cost of services which are the subject of the review.

It is also important that salmon farming fees move away from the existing acreage regime. Apart from the fact that the annual fee per hectare (currently \$317.90) is far too low to provide an adequate return to the Tasmanian community, it fails to account for impacts which change with location and fish biomass. High biomass is often correlated with adverse environmental impacts. An approach adopted for other Tasmanian environmental levies, where the fees are related to the quantum of activity, should be adopted.

The TISC has proposed the following actions for inclusion in the Plan on multiple occasions and we provide an updated version here, both for your benefit and as our formal response to the draft 10 Year Salmon Plan. We would be pleased to meet with you to discuss these and other points in further details, and how they could be included within the final version of the plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Coughanowr', is displayed on a light blue rectangular background.

Christine Coughanowr

On behalf of the Tasmanian Independent Science Council

Encl: *Key Strategies & Actions for Inclusion in the 10-Year Salmon Plan*

KEY STRATEGIES & ACTIONS FOR INCLUSION IN THE 10-YEAR SALMON PLAN

The TISC recommends that the following actions be incorporated within the 10 year plan to ensure that this important industry is indeed sustainable with respect to the economy, environment and society.

1. **Implement a moratorium (halt) on further growth, specifically on tonnage/biomass** (not leased area) until existing operations have been reviewed and adjusted to ensure sustainable production that does not damage our environment, limits biosecurity risks and supports long-term employment and revenues to the state. We suggest that a period of 3 to 5 years may be needed for this.
2. **Reduce salmon farming in nearshore waters, with priority given to ceasing operations in sensitive, sheltered and biodiverse areas, and areas with high public amenity values** (e.g. Long Bay, Macquarie Harbour, areas of the Channel/Huon and Okehampton Bay).
 - Review/audit all current leases – both operational and unused – for current or potential impacts to environment and amenity
 - Evaluate local, intermediate and broad-scale impacts; assess risks and identify/prioritise worst performing leases for their removal
 - Establish carrying capacities and set lease-specific limits on pollution
 - Revise Environmental Licenses and/or retire marine farming leases/licenses in unsuitable areas
3. **Investigate and plan for future fully-recirculating, land-based and/or fully offshore production and develop incentives to transition away from nearshore operations**
 - Undertake a detailed and unbiased review of both land-based (fully-recirculating) and offshore production options.
 - Identify suitable locations on land and offshore, in consultation with the community
 - Investigate and offer incentives to transition to cleaner production methods
4. **Support genuinely independent, world-leading science** as a basis for planning and management. This will require an **independent funding mechanism** to avoid real or perceived bias and should be fully funded by the aquaculture industry. Scientific reports should be made readily available to the public in a timely manner. Additional research is needed to address key gaps including:
 - multi-sector marine spatial planning; comprehensive baseline surveys as a pre-requisite for new leases and for all lease renewals, to be repeated every 5 years; carrying capacity modelling; improved BEMP designs; impacts on protected species; and risks to freshwater systems, including potential health risks associated with cyanobacterial toxins
 - Predicted impacts of climate change as well as new and emerging health and safety impacts on humans or native species, to short-cut the delays inherent in normal funding streams
5. **Ensure independent and rigorous regulation, management and enforcement**
 - Modify legislation such that the EPA Director and EPA Board are clearly independent from political and industry influence
 - Restructure the Marine Farm Planning Review Panel to its previous role as a decision-making body, not an advisory role to the Minister. Broaden the membership to include community and conservation representatives
 - Complete and implement legislative/regulatory reviews, including EMPCA amendments and a review of the Marine Farming Act 1995
 - Complete regulatory tools, including environmental, operational and biosecurity standards. These standards should include lease-specific limits on production and more comprehensive monitoring and management criteria (including nuisance algae and invertebrates)
 - Fully regulate and monitor associated aquaculture operations, including well boats and their discharges, desalination plants, net cleaning facilities, and fish waste composting and reuse facilities

6. Implement full transparency and regular reporting

- Prepare and publish annual reports on salmon operations and impacts at state, regional and lease-specific levels
- Expand the salmon portal to include detailed and up-to-date information on biomass, pollution loads, water quality, salmon escapes, disease & mortalities, use of antibiotics and other therapeutants, seal and bird mortalities, etc. 'Compliant' is not a meaningful indicator, nor is 'Y/N'.

7. Undertake genuine community engagement, including regular workshops to discuss and resolve concerns

- The annual environmental reports above should be presented to the public at workshops, along with monitoring results, operational context and future plans. Questions and concerns raised deserve clear answers and meaningful solutions. In some regions, biannual or quarterly meetings may be warranted.
- Representatives from the community/NGOs should be included on planning, review and decision-making committees, such as the Marine Farming Review Development Panel and EPA Board.

8. Ensure a fair economic return

- Undertake an independent and unbiased review of costs and benefits of salmon industry 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 direct and indirect jobs, implications of increasing automation, adequate fees to ensure full cost recovery, potential auction of production quota/leases, payment of royalties or Gross Product Value fees, payment of Council rates, rehabilitation bonds, etc.
- Investigate what is considered a fair return overseas, and how this is implemented
- Consult with affected communities on their views
- Increase fees and rents to cover full costs of salmon-related regulation and management, including monitoring and scientific studies, reporting, training, use of public infrastructure, etc

9. Monitor and manage freshwater use

Document current and future freshwater requirements for the production of smolt and bathing fish, and determine if/how these can be provided without adverse impacts on community supplies or the environment

10. Improve management of freshwater operations

All freshwater hatcheries and smolt production facilities should be fully Recirculating Aquaculture Systems (RAS), and clear design criteria must be established to define this. Large-scale flow-through hatcheries should no longer be permitted in Tasmania. A policy and sunset clause are needed to convert existing flow-through operations to RAS within no more than 3 years. Flow-through hatcheries that discharge water polluted with fish wastes should no longer benefit from trivial non-consumptive water allocations fees (approximately \$400/year, regardless of the volume used).

- Review/audit current operations, including impacts to environment and amenity. Prioritise worst performing operations and set specific limits on pollution loads
- Develop clear RAS criteria and standards for existing and future inland fish farms
- Link water license fees to discharge quality, with higher fees applied to poorer quality discharges
- Convert large flow-through systems to RAS within 3-years or retire them from service
- Improve monitoring of hatchery effluent, including potential health risks associated with cyanobacterial toxins on drinking water supplies and recreational activities