Blue Economy CRC: Proposed area for trialling aquaculture in Commonwealth waters
TISC Response to Australian Government 'Have Your Say'

https://haveyoursay.awe.gov.au/aquaculture-trial-site/survey_tools/aquaculture-trial-site

As independent scientists with expertise in a variety of fields, the Tasmanian Independent Science Council is still developing a position on the pros and cons of offshore fin-fish farming. However, this much is clear: to be profitable, it needs to be large-scale, highly automated and not too far from associated land-based operations.

The above proposal provides very little detail about the scale and extent of the proposed experiment, how it will be developed, and particularly how community input will be included.

Key questions include:

- What are the potential/likely impacts and how will these be investigated?
- What research has been completed in the region to date to monitor and model potential impacts?
- What baseline surveys have been done and/or are proposed?

The scale, boundaries and timelines of the trial need to be much more clearly defined. How many cages? Where? At what point will the research move from infrastructure only, to infrastructure plus fish? Where will freshwater for bathing fish be sourced from? Will cages continue to be added throughout the three-year trial? In the event of a severe mortality event, how/where will the dead fish be disposed of? What measures will be undertaken to manage seal predation in a humane manner?

At what points in the trial will the community be consulted, and how will their views be taken on board?

How will the economic benefits be determined, and how will these benefits be shared with the local community and state. How will profits from the experiment be distributed? (A single large pen could easily produce over $5 million worth of salmon at wholesale prices.)

What happens at the end of the trial? Will there be a halt, until the results are fully reviewed, discussed and supported? Or will this morph into full-fledged offshore farming?

Given that it will be in Commonwealth waters, how can/will Tasmanians have any control?

A single large pen, fully stocked with salmon, is not a trivial thing. For example, a 240m circumference 'Fortress Pen' – similar to those currently being used off North Bruny - could easily produce the equivalent dissolved inorganic nitrogen load as the entire city of Burnie (18,000+ people).

Finally, Burnie coastal waters have a long history of industrial pollution associated with the long-running APPM paper mill, the Tioxide plant and North West Acid plant. These would have discharged significant contaminants, possibly including heavy metals, dioxins and arsenic over a large area of the coastal zone. Have any recent surveys been completed to assess contaminant levels in sediments within the proposed experimental area? Or to evaluate how fish farm infrastructure and/or organic wastes could potentially disturb contaminated sediments, including possible remobilisation of contaminants? This could raise significant human health concerns associated either with the farmed fish and/or regional wild fisheries.

We strongly recommend that – before this trial commences – these, and other questions are addressed, and that a staged process is clearly articulated that ensures regular updates and consultation are completed **prior to** commencing the next stage. A clear break is also needed between experimental and commercial operations.

Unfortunately, due to the very short period provided for comment, we are unable to provide a more detailed submission and full references, but are happy to provide further detail should there be an opportunity to do so.

Submitted on behalf of TISC - 24 February 2022