

# Draft Environmental Standards for Tasmanian Marine Finfish Farming 2023



## SUMMARY OF KEY ISSUES

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The draft Environmental Standards for Tasmanian Marine Finfish Farming 2023 (“draft Standards”) will be the key regulatory tool for managing the environmental impacts of the finfish aquaculture industry. The draft Standards set out the provisions the industry must meet to be granted an environmental licence to operate under the *Environmental Management and Pollution Control Act 1994*. These draft Standards have been designed with the intent to “protect the Tasmanian marine and coastal environment by promoting sustainable use of Tasmania’s marine waters for finfish farming”.<sup>1</sup> **However, the current draft Standards provide less environmental protection and clarity than the existing regulatory conditions, and do not appear to be based on best available science.**

### 1. Significant extension of allowable impact

The draft Standards propose a four-zone system: the farm zone (pen bays within lease area), depositional zone (35m from the lease boundary), dispersal zone (a further 100m) and regional zone (to be determined on an *ad hoc* basis). This could allow measurable impacts from individual leases to extend from the current 35m to 135m from the lease boundary.

### 2. Key omissions

Important environmental considerations such as stocking densities, fallowing times and salmon escapees are not addressed in the draft Standards at all. Furthermore, the draft Standards do not set caps for maximum allowable biomass (MAB), feed inputs and dissolved nitrogen output for both lease regions **and individual leases**.

### 3. Different standards for existing and future operations

Some standards appear to apply only to future operations, such as the need for baseline surveys, depositional and nutrient dispersal modelling. Biogeochemical models are apparently only required to be used where they have already been developed. It is essential that existing operations – some of which have expanded hugely over the past 5 years – are subject to the same level of scrutiny and regulation as new leases – not quietly grandfathered in.

### 4. Multiple associated standards and guidelines

The Draft Standards lack clarity on how they will be applied by the EPA to decisions regarding Environmental Licenses. It also is unclear how the Draft Standards will relate to the EPA’s non-statutory Technical Standards, as well as a range of other standards, frameworks and guidelines.

### 5. Lack of transparency

The director of the EPA has major discretionary powers (for example, delineating regional impact zones), while the role of the EPA Board is limited. Industry operators are largely responsible for the development and implementation of monitoring and management tools, but it is strongly recommended that this work be done by the EPA or independent consultants to remove the question of bias and ensure consistency between operators. Regular, public reporting be required of both operators and the EPA in a regular, timely and transparent manner, and include biomass levels, feed inputs and/or nutrient loads associated with specific regions **and individual leases**. Reporting should also include monitoring results and visual footage at the 35m compliance boundary, fish escapes and mortalities, and the use of antibiotics. Review processes and timelines for these standards should be included and an opportunity for third-party appeals should be provided.

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<sup>1</sup> [FINAL Consultation Draft Environmental Standards 2023.pdf \(nre.tas.gov.au\)](#), page 2.