

TISC Review of DRAFT Standardised Marine Farm Management Controls

20 June 2022

The Tasmanian Independent Science Council (TISC) welcomes this opportunity to comment on the draft standards.

As indicated in the introduction to the document, its intent is primarily to standardise existing controls, rather than to improve them. We strongly recommend that this opportunity to improve the status quo not be missed, as there are a number of areas that fall well behind international best practice.

Broader policy concerns

The process by which Marine Farm Development Plans (MFDPs) are developed and amended is unsatisfactory and needs a major overhaul. All existing Marine Farm Development Plans, as well as individual leases, should be regularly reviewed for suitability and impact, with license conditions and monitoring programs adjusted to take into account new information, technologies and risks. We recommend that MFDP reviews be undertaken every 5 to 7 years. This will become increasingly important as ocean temperatures continue to rise, making some regions unsuitable for intensive fish farming.

Baseline surveys should be repeated, as should carrying capacity modelling, and the location and allowable uses of lease areas should be revised as needed. Some leases in poorly flushed coastal waterways may need to be removed.

Unused farming zones ('zombie leases') should also be removed and re-added only after careful consideration and community consultation. For example, there are currently nine unused marine farming zones in Norfolk Bay that allow for finfish farming. These require urgent review and modification as Norfolk Bay would be an extremely risky location for finfish farming due to its limited circulation and high biodiversity. In particular, the Norfolk Bay/Frederick Henry Bay region holds the last known populations of the endangered red handfish. In 2018, Huon Aquaculture installed two large pens of potentially diseased salmon at a zombie lease in Norfolk Bay, causing a major community backlash.

The siting and review of MFDPs should take place within the context of a broader marine spatial planning framework and must include an opportunity for community and other users input to ensure that their issues and concerns are being addressed.

Comments on draft Standard

There appears to be considerable overlap between the authority and directives of the NRE Secretary and the EPA Director. Greater clarity in discriminating between their respective roles and responsibilities may be needed, particularly now that the EPA is an independent entity.

The Management Controls relating to biomass and TPDNO limits should allow for these to be applied to specific leases, in addition to broader MFDP regions, or parts thereof.

A maximum stocking density of 25 kg/m³ is very high by both Tasmanian and international standards – this would be risky for both fish health and the environment. None of Tasmania's operators would admit to keeping their fish in such close quarters, and indeed some have promoted stocking rates of no more than 10 kg/m³. We recommend stocking densities be reduced to 10 to 15 kg/m³ for all regions in line with modern practices. Areas with limited flushing and a higher incidence or risk of disease may require even lower stocking rates or removal of aquaculture operations.

The Tasman MFDP specifies a maximum stocking density of 15 kg/m³, not 25 kg/m³.

The Macquarie Harbour MFDP doesn't include a maximum stocking density. Was this an oversight?

The requirement that leases showing visible impacts of over-enrichment be 'followed as soon as practicable' is far too vague. Further clarity is needed about what steps are required to do this in a timely manner.

All leases should be required to have an approved disposal management plan for mortality events as part of their standard operating conditions. Low oxygen events and jellyfish kills can (and have) resulted in hundreds of tonnes of dead fish that cannot be disposed of in local landfills at short notice. This must not continue to be managed in an ad hoc manner.

A clearance distance of 1m between the bottom of the cage and the sea bed is far too close, and does not allow for adequate water circulation. This needs to be reviewed in line with modern standards (e.g. Norway).

We recommend that initial baseline surveys be repeated at regular intervals (e.g. 5-yearly), as is done in New Zealand.

It is poor practice to allow escaped salmon to disburse into adjacent waterways without recovery operations. Many countries impose large fines when this occurs. This section should be reworded such that operators are required to have an approved plan to recover escaped fish promptly, either by the operator or by contracted fishing parties. This should not be left to the discretion of the Secretary. Escaped fish may or may not prey on native species, but they pose a biosecurity risk, attract predators, slowly starve to death and eventually decompose in local waterways, all of which are unacceptable.

We hope these recommendations are useful and will be incorporated into the final version of this standard. Please contact me if I can provide any further information.

Finally, can you please confirm that all submission on this matter will be made publicly available?

On behalf of the Tasmanian Independent Science Council

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About the Tasmanian Independent Science Council

The Tasmanian Independent Science Council is dedicated to science-based policy reform to ensure the long-term health of Tasmania's environment. The Council includes scientists and professionals who provide independent, non-government advice, focusing on policy reforms of significant State interest. We seek to inform public debate and influence legislative reform to improve outcomes for terrestrial, freshwater and marine ecosystems.