

The Shooters, Fishers and Farmers Party Tasmania (**SFF TAS**) remains supportive of a Tasmanian salmon industry and the employment and economic value it creates. We appreciate the opportunity to make a submission into Fin Fish Farming in Tasmania and we look forward to addressing the committee in person if the opportunity presents itself.

Below is our submission with particular attention to the terms of reference to:

1) The implementation of the Sustainable Industry Growth Plan for the Salmon Industry and its impact on commercial finfish farming operations and local communities, including: a. data collection and publication; b. progress in the development of an industry wide biosecurity plan.

Currently the import requirements for non-viable finfish and finfish products are set out in the notice as per Section 18 (1) – General Authority under the Animal Health Act 1195¹

It is important for Tasmania to continue to actively promote and call for more stringent border checks to prevent the possible importation of salmonoids from overseas sources. The risks to the Tasmanians salmon industry from diseased imported fresh and frozen salmonoids are just too great. The best method to protect the Tasmanian salmon industry and its associated indirect, direct economic and social benefits is to eliminate the risk by not allowing imports and to increasing funding into increasing biosecurity resources.

Not only do imported salmonoids pose unacceptable risks to the Tasmanian salmon industry, the risks of pathogens getting into Tasmanian waterways could also impact on other freshwater aquatic life.

The risks are ever present² and the penalties for imported salmonoids should be increased significantly. On this issue, Tasmanian cannot afford to be complacent.

2) Application of the Marine Farming Planning Act 1995 relating to: a. preparation and approval process for marine farming development plans, including modifications and amendments to marine farming development plans; b. allocation of leases, applications for and granting of leases; c. management of finfish farming operations with respect to the prevention of environmental harm

Marine farming is one of Tasmania's major industries and it's important for the industry to be managed appropriately by a truly independent authority. What concerns SFF is the lack of transparency and accountability afforded to members of the Marine Farming Planning Review Panel where they are offered protection and immunity as a judge of the Supreme Court³. In today's society there is a general expectation that instruments of government are open and transparent. Sadly, this trust has been eroded in recent times.

b. allocation of leases, applications for and granting of leases

¹ <https://dpiwwe.tas.gov.au/Documents/Importation-of-Non-viable-Fish-and-Restricted-Fish-Material.pdf>

² <https://www.abc.net.au/news/rural/2015-10-27/biosecurity-breach-by-supermarket-under-investigation/6888042>

³ **13. Protection of members and witnesses**

(1) A member of the Panel, in exercising any power or performing any functions as such a member, has the same protection and immunity as a judge of the Supreme Court.

(2) A person required to attend or appearing before the Panel as a witness has the same protection as a witness in a proceeding in the Supreme Court.

In recent times, the legacy on old leases has created much angst among local communities. At the time of the old leases being granted, the world was a different place without contemporary management practices and regulatory oversight.

It is recommended that the method and approach in approving leases on public waters be more open and transparent and for increased periods of public consultation to be considered. Additionally, land value has escalated and perhaps consideration should be given to the value of these leases, as well as to the terms of the leases. For example, do they include requirement for rehabilitation of leases to their former state?

c. management of finfish farming operations with respect to the prevention of environmental harm

In recent times, SFF TAS has been receiving a number of reports about seal numbers in Tasmanian waters, with the increase in the numbers of seals meaning that seals are becoming bolder and more dangerous to people in the marine recreational and commercial industry.

It is understood DPIPWE has been performing ongoing monitoring of Australian fur seals in Tasmania for many years. However, it has been some time since there has been a proper survey of seal numbers. We believe the estimate of overall seal populations by the estimate count of Australian fur seal (AFS) pup numbers is not a true indication of population size.

Results from the 2013/14 seal survey indicated a significant decline in the number of Australian fur seal pups, references the report from the 2013/14 survey (McIntosh_etal_2014_PINP Report on Aust and NZ fur seal pup estimates 2013-14) and a research paper that resulted from this work (McIntosh_etal_2018_AustFurSealMetaPopTrends). However, the anecdotal evidence from recreational and commercial fishers indicate seal numbers have grown to levels where they are now not only considered a pest but a real danger to those working in the industry. There are reports that seals numbers are having a negative impact to the charter operators, the crayfish industry when they put back under size crays, only to be snapped up by waiting seals, and to the commercial and recreational fishers. There are regular reports of seals travelling upriver to New Norfolk and Meadow Bank and it is well documented that the negative impacts seals are having on the commercial fishers in the North West.

SFF recommends a detailed survey be conducted into seal numbers and due consideration be given to seal number mitigation programs be reassessed.

3) Any other matter incidental thereto

While this enquiry appears to be focussing on the salmon industry, it should not be forgotten that Tasmania produces quality ocean trout for the market and there is also a small Tasmanian freshwater eel fishery industry.

The eel fishery is a small fishery based on two species of anguillid eels, short finned and long finned eels. The size of the fishery and growth is relatively small, which focuses on the “brown” feeding eels harvested in inland waters.

As these eels are harvested from inland waters, it’s important for Hydro to continue to examine and improve options to mitigate impacts of dams and power generation infrastructure on eel migration.

Other considerations is for land owners and councils to continue to improve the mitigation strategies to reduce the likelihood of heavy metals and other pollutants from entering Tasmanian waterways and estuaries.

Around the world, there are a number of viable, sustainable and eco-friendly methods that exist around open cage fish farming, including utilising land based technologies.

Land based salmon farming is practiced around the world, and closed containment aquaculture may well be the future. These practices have succeeded in eliminating waste and pollution, the main concerns of open cage sea farming. Let's have a salmon farming industry that's truly world class and operates with clear social licence.

With projected growth in the industry and the virtual doubling of salmon production over the next few year, SFF feels that it is important that Tasmania achieves this growth in a balanced manner as close to environmentally neutral as possible, and doesn't result in degradation to our precious marine estuaries.

SFF Tasmania remains supportive of a Tasmanian salmon industry and the employment and economic value it creates, we simply believe it is time to review and update the poor regulatory oversight authority.

For more information please contact

Ken Orr
Shooters, Fishers & Farmers Party Tasmania
Mob: 0408122209