

Allison Waddington

From: [REDACTED]
Sent: Thursday, 28 November 2019 9:02 PM
To: FinFish
Subject: current fin fish farming operations
Attachments: RoaringBeachFroelich_2.pdf

Stefan Froelich
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22.11.2019

Dear Sir/Madame,

I am very concerned about the salmon farm industry in Tasmania as it currently operates.

I came traveling to Tasmania first in 1999, and loved it for its beauty, wildness, cleanness, quality surf, etc. No where in Europe I experienced the same. I came back every year for about 3 months enjoying nature, surfing the beautiful beaches and reefs until I stumbled upon a piece of land overlooking a pristine surf beach and bush. Anywhere else in the world it is pretty impossible to find that with the surf only a 5 minute stroll from your property. The property is not built out by multi million dollar mansions, with a coastal reserve right out the front. I was able to purchase the property, put all efforts into getting my permanent residency, and moving to this piece of paradise. In 2013 I finally scored the permanent residency and moved to Roaring Beach. I paid a lot of blood, sweat and tears to live in this unspoiled paradise. Everyday I enjoy the views and the vibes this place has to offer. I love surfing on the beach, snorkeling in the next bay over, sitting on the rocks or sand dunes, watching sunrises, sunsets, the odd yacht, fishing boat or cruise ship coming past, the wild days, or at night the stars and the southern aurora over the horizon. I know I am very lucky to be able to overlook the beach, Wedge Island and all Storm Bay virtually out of bed, so for me personally, the tick on the WOW development has a huge impact. Although the traffic isn't there yet, the blinking markers and the 'dummy'- pen are right in the middle of storm bay and are already giving the whole scenery and vibe a different feel.. don't wanna see the whole industrial site out there...

The sly fish farm extension at Creases Mistake about five years ago brought the corners of that lease into my view, it didn't impact on me that much though, as it's in front of the last houses of White Beach, the view over the bay wasn't compromised too much and I could still watch the southern aurora over a undisturbed bay without the lights, boats, noises, of an oversized industrial development. Do the Developers (here Tassal)/the Government plan to reimburse the people that bought/moved in, only due to the values it would lose?? Buying next to a

conservation area, coastal reserve, with Wedge Island (managed by national parks) out the front was the insurance that it can't be spoilt, no one could ever expect those plans...??

I am questioning if a large industrial site like the proposed lease 'West of Wedge' will be beneficial even for the economics in the long run anyway, as the tourism sector, as well as the 'clean green tasmanian' image is a big job-provider, and it has lots more undeveloped, and more sustainable options. For example, in December 2017 a film crew of 15 (director, main acts, biologists, divers, cameramen...) were staying at the Lufra Hotel in Eaglehawk Neck to film part of a German cinema movie ('Checker Tobi', a successful German science kids TV series was putting out the first cinema movie 'Checker Tobi & das Geheimnis unseres Planeten' - 'Checker Tobi and the secret of our Planets' which won heaps of prizes in Germany). They came to film the unique unspoiled nature and landscape on the peninsula, lots of underwater shots (Leafy Sea Dragons, Seals, caves etc, near Cape Huoy) and lots of other wildlife and scenery (a key scene was filmed while driving along Nubeena Back Road with beautiful views of Storm Bay, some at Roaring Beach and some up on my property). Places like Tasmania, particularly the peninsula are chosen for its unspoiled cleanness and wildness - with developments of that scale, in that position - it wouldn't be chosen again (definitely not my block.. can I expect any payout of the loss of value??). It's lots of local businesses benefitting of those events as well, in this case immediately: Lufra Hotel (15 people accommodation & dinners) Eaglehawk dive centre, whole place & boat booked for several days + another Eaglehawk charter boat, lots of daily snacks at Doolishious, Nubeena bakery, Mussel Boys etc, depending on where they were filming, entrance fees at Unzoo, Port Arthur and in town.

In the long term - the bigger impact - these pictures went out into the world (in this case Germany) and promote this clean, wild country, and will attract more people that want to find and experience exactly that.

I understand that some locals that were born and raised here, haven't seen enough of the world to value the extraordinary untouched beauty of this spot,- they might just think, that the new lease gives us 70 new jobs - hooray, but the existing 'clean & green' image of Tasmania & specially the peninsula is damaged, and a lot of local businesses, other jobs, potential jobs and more sustainable developments will suffer, cause the area wouldn't be chosen for that scenic shot, drive, video, movie etc. again....

Why can it be considered to put an industrial site of that size right into a renowned bay of wild beauty surrounded by national parks, conservation areas, coastal reserves and tourist attractions? A bay that is photographed and visible from the most iconic outlooks?? Why not taking it either miles out to sea (like the offshore wind farms in the Baltic sea) or somewhere surrounded by either developed farmland, or near industrial areas, where the visual impact, noise and pollution isn't that misplaced??

Another unmentioned issue is, - unquestionable- fish farms attract seals, and with them - large predators. A development that scale will undoubtedly attract more of them, which will impact

on the recreational surfing beach at Roaring. It is one of Tasmania's most consistent surf beaches, and attracts lots of Tasmanian's, traveler's, competitions, even the Australian junior titles. Can anyone accept the threat of this renowned recreational beach due to regular shark sightings, warnings and attacks? Will Tassal be responsible for people getting attacked? Will we be able to sue them for the first eaten surfer/diver out there??

Another concern is the amount of marine debris. Although Tassal is aware of the problem and is doing regular clean ups, we, and a lot of community members are constantly picking up marine debris that is swept ashore from the existing leases (every walk around Apex point or out to Kelpies, I drag along bits of rope, pipe, plastic, etc.) and these leases are in calm waters compared to what's planned, so how will Tassal be able to hold on to their stuff in the wild seas west of Wedge if they can't succeed in the 'calm'??
How much of that debris is undetected under water if we find that much swept up on the coast??

Tassal's Sustainability Report 2016 states 'A rigorous stakeholder engagement process is undertaken to ensure our social license to operate'. So far I never heard of any stakeholder engagement. The first meetings were very poorly advertised, and then one collided with 2 other community Christmas functions?? Let the local ratepayers vote and see the result of the 'social license' for the expansion.

Does Tassal or any of the other companies have a legal agreement to cover the financial costs in case things go wrong & environment is damaged?? For example:

- Biological (a disease caused by the hyper overbreed species catches wild fish & wipes other species out, etc...)
 - Environmental: a pen rips to bits & thousands of non native fish escape, damage the native balance and create an environmental disaster
 - Social; due to the extreme conditions out there, workers get injured or die, or due to the increased shark presence, some beachgoers (surfers, divers, swimmers) get attacked or die..?
- Or will the government (ratepayers) have to pay for it?

As a local resident of Roaring Beach and as a recreational user of the waterways I strongly object to any more expansions. I strongly support a moratorium of all fin-fish farm expansions in the state, which means a temporary pause so stricter regulations can be brought into place. I am absolutely sure that the damage outweighs the short sighted financial benefit, specially given the governmental level of support (subsidies) in correlation to the benefit. I am passionate about my pristine paradise and would like it remain predator free, safe from environmental hazards pollutants, free from any more visual disturbances, free from industrial noise and enjoyable for future generations.

in the process of getting the 'west of wedge' expansion granted, Tassal was giving false information which is already 'provable'..

1. Very early days I raised concerns about the visual impact in such a pristine area, the reaction was very positive and Tassal promised to supply a assessment of my photos within a few days.. I sent pics including exact coordinates of the spot the pics were taken (43°04'54.1"S 147°40'16.6"E is the only one i ever got back processed)) , so they can take into account the exact distances and elevations... They never took any feeding barges etc. into account, and what i got back a few month,- and never ending emails later was this:

I pointed out that it's incorrect but was assured that's what's possible (happy to forward my extensive email correspondence regarding that..). Anyway, the first few buoys were dropped in august and are highlighted in the following pic (a pen was dropped in early october, but i haven't got a camera at the moment, so not in the pic) :



Is that the standard of their basic science...??

Second, i have plenty of pics & correspondence of the debris issue of the existing plants,-





That's called 'best practice' in the in comparison calm waters currently.. How will it look in the wild waters west of Wedge??

Anyway, in my view, things have to change,- a moratorium on all fin fish farm expansions has to be in place until the science is done,- impact is assessed by independent bodies, that do their job professionally (unlike the visual assessment above for example or the water quality and environmental assessments that are so far done by the companies, with the result being clearly visible in Macquarie Harbor)

1. Public reporting for disease outbreaks and other bio-security incidents needs to be mandatory,
2. Environmental licenses must set a hard cap on biomass and dissolved nitrogen and other pollutants emitted into our waterways from pens, hatcheries and other infrastructure.

3. The price for their leases and the penalties for their pollution should take the size of the company and their profit into account.
4. The Marine Farming Planning Act needs to be amended to explicitly require the Panel to assess and protect social values e.g. impacts on recreational boating and fishing, visual impacts, noise and the impact on the 'clean green Tasmanian' image.
5. The decisions of Panel regarding new leases and significant amendments to leases should be subject to third party appeals.
6. There should be a general civil enforcement provision, allowing any person with an interest to enforce non-compliance under the Marine Farming Planning Act.
7. The panel membership needs to be amended:
 - Increase representation on the panel for interests not aligned with fish farming (Conservation group, recreational fishing and community).
 - Require fish farming scientists to be totally independent of commercial interests.
8. The panel processes needs to be amended:
 - Panel should be required to have a full complement of members in order to make decisions regarding new/amended leases and have a quorum to make decisions.
 - Transcripts of Panel hearings should be produced and made public.
 - Panel should be required to produce a statement of reasons and response to public representations and make it public.
 - The Panel's reasons and response to public representations should be subject to review by the TPC (and potentially TPC can make recommendations), as happens with draft reserve management plans, draft water management plans and proposed planning scheme amendments.
9. The Marine Farming Planning Act should be amended to remove or substantially constrain the minister's powers to over-turn decisions of the Panel.
10. Require the Panel to integrate its decisions with biosecurity requirements.
11. The Environment Protection Authority (EPA) needs to be amended:
 - Public input and third party appeal rights: All environmental licence applications and significant amendments must be subject to a decision by the EPA Board (and referral to the Board not at the discretion of the Director) so that public input and third party appeal rights are guaranteed.
 - Lease monitoring data: There should be a requirement to publicly release individual lease monitoring data, details of compliance and enforcement activities, and other EPA

decisions including decision rationale (where there are no commercial in confidence considerations).

- Environmental bonds: The EPA director should also have the power to impose environmental bonds to ensure companies maintain adequate funds to undertake any necessary remediation work.

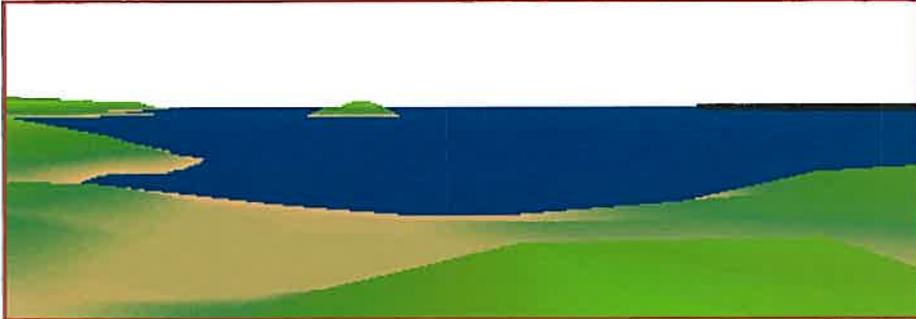
12. The Marine bio-spatial planning needs to be amended

- The Tasmanian Salmon Growth Plan be scraped and introduce a Marine biospatial planning process in its place (consider basing the process in legislation). This process would be informed by science and be required to consult all stakeholders to develop broad strategy to guide/control where best to have marine farms. It would also identify priority areas for recreational boating and fishing, scenic and biodiversity protection, marine tourism, infrastructure etc.

I'd be very happy to present my concerns to the committee and hope to hear from you.

Yours faithfully,

Stefan Froelich



Fish pens will be near horizon here