

SUBMISSION TO INQUIRY INTO FINFISH FARMING IN TASMANIA

Preamble:

Salmon marine farming has significantly developed in Tasmanian coastal waters over the last 30 years. Many Tasmanian's now believe there is also a significant detrimental impact on other users of our coastal waterways as a direct result of Salmon farming operations. In addition to forced restriction to areas that have traditionally been freely available to all there is also impact to areas within and adjacent to lease boundaries that reduces survivability of wild fish due to a detrimental effect on habitat. Noncompliance with lease conditions has seen bacterial mats extend 500 meters outside of lease boundaries and uncontained infrastructure increase risk to recreational boat operators both of which reduce trust in the industry. We continue to see poorly planned initiatives such as the Twamley Dam and associated pipeline, the hatchery proposed for Meadowbank Lake and arrogant opening of leases to harvest fish with questionable biosecurity issues. While industry players have touted transparency in reporting responsibility the reality is failure to disclose mortality rates, impact on benthic condition, escape numbers and loss or adrift infrastructure.

The adaptive management approach adopted by industry and Government is a root cause of the catastrophic failings in Macquarie Harbour. The association between Industry and Government is one of partnership. The separation required between legislators, regulatory enforcement and industry is no longer sufficient to ensure the trust and social licence to deliver the confidence required that Salmon farming activity will benefit all Tasmanians. The "turn a blind eye" or adaptive management approach to many issues that are widely believed to have contributed to the negative impact on Tasmanian marine ecosystems in and around Salmon farm leases is a major concern. It is significant that lease conditions have been breached, mortality rates and escape numbers gone undisclosed and infrastructure loss has occurred; the reputational damage done to the industry has destroyed the requisite trust for regulation compliance responsibility to be left with industry. SEMP would like to see an efficient, predictable, transparent and enforceable planning and regulatory system be adopted.

Current lease conditions allow benthic composition within lease boundaries to change due to elevated organic loading of sediment from excess feed and solid fish excreta. There is also additional nutrient loading released through gills and skin that is said to adversely affect water quality and is yet to be understood in relation to general and site specific issues already of concern (such as adding to the nutrient load already present in the Derwent River). This allowable pollution has an immediate impact on wild fish habitat within the zone of impact and a secondary effect on water quality and habitat in the form of fine particle sediment, nutrient loading and dissolved oxygen levels which is unacceptable for an industry looking to expand into more recreationally important areas.

As the industry has commenced a significant expansion plan into new waters outside their current marine farm zones the scope, breadth and potential impacts have created a heightened awareness, within the recreational fishing community, around the future of the industry including the current expansion plans. SEMP is concerned there is no set limit to industry expansion leaving unresolved the extent or potential impact of Salmon Farming in our coastal waters.

Given the breach of trust resultant from systemic and regulatory failings of the Salmon farming industry; SEMP requests a moratorium on the current expansion plans until confidence, that the impact on recreational fishing communities will be minimised, can be restored.

The key issues associated with salmonid marine farming that require resolution are as follows:

1. Loss of access to marine waters which leads to a loss of public amenity,
2. The negative impact of salmonid marine farming on the marine environment,
3. Public interactions with marine debris lost or discarded by the salmonid marine farming industry,
4. Transparency of disease, escape, benthic condition and other environmental impact data associated with marine salmonoid farming,
5. Planning and review processes that fail to provide genuine opportunity for public influence on Salmonoid Marine farming activity, growth and impact,
6. The partnership espoused by industry and government fails to sufficiently acknowledge community opinion,
7. Fresh water supply,
8. Continuing negative outcomes experienced by other farmed Salmon producing countries across the planet,
9. A clear projection that gives understanding of what limit will be placed on expansion plans.

SEMP would like the opportunity to present to any inquiry held to look into or address concerns around Salmon farming in Tasmanian Coastal waters.

A couple of personal reflections by our members at our SEMP meetings:

“I’m a Tasmanian this place is where I live, raise my children and work... The experience of seeing the Salmon industry develop has been one punctuated by disappointment. As an informed member of my community I’ve seen changes that are disappointing such as the introduction of farming activity in Okehampton Bay, the proposed Twamley Dam and pipeline, expansion into Storm Bay and the effects on the D’Entrecasteaux Channel and Macquarie Harbour all under agreement from Government; all said to be well managed; all reportedly beneficial to Tasmanians. This piece puts a contrary view in that, as a Tasmanian, I only see the disadvantage to me, I only see the negative affect and I can only presume a pathway that is detrimental to the aspects of our coastal waters that I enjoy the most.”

“I hear of farm hand jobs being lost to automation, I hear concern from community members around undue influence being bought through sponsorship by the industry and I am impacted by loss of access to traditional fishing grounds and interaction with debris such as ropes, floats and feed pipes, I keep hearing about nutrient levels being too high and a push for growth that is seen by many, including me, as unhealthy. There is a glossy picture painted by this industry that is not replicated once I look beyond the public profile put forward by the industry and their partners in Government. I’m concerned that public ownership of Salmon could see responsibility for decisions and action will eventually be held outside of Tasmania. In short there’s an ugly side to the industry I want addressed before I see any further expansion.”

“Tasmania is a wonderful place full of wild and remote places, it is the wild I love and I would like to see dedicated protection provided to the brand and lifestyle I see as important. I fish and walk regularly around this great State and I don’t believe there is sufficient importance placed on what we have now, undeveloped and free for all to enjoy. The push for expansion seems devoted to money making at the expense of all else... the industrialisation of our waterways which is a horrendous and seemingly looks to mimic a development course that is typical of developed nations. Tasmania is unique in that the balance between the natural

world environment and industry provides us with a great place to live... The moves we're seeing to build our industry mustn't compromise the value we have now. The growth plan is short sighted and at odds with the Tasmania I want to remain in place... They're like bad neighbours I don't want to encourage them..."

Below is an outline of the issues that concern SEMP:

Social licence: We believe that the Salmon industry in Tasmania does not have social licence.

- Macquarie Harbour disaster – companies can't be trusted.
- Public consultation – nil/limited. See recent Meadowbank situation.
- The waterways are a public resource, but once they become leased, the areas are not available to the public – the public are not aware of this.
- There is a decrease in property values as a result of farms.
- Loss of public amenity – light, noise, water pollution.
- Issues pertaining to the Council e.g. West Coast Council going to charge rates as per mining industry – why doesn't this happen across the board?
- TASSAL providing corporate sponsorship of Tasman Peninsula school – causing community division.

Marine debris: an ongoing feature of the salmon farm industry is marine debris. There is no centralised register of marine debris.

- How much debris from the salmon industry has entered our waterways? There is no transparency around how much debris has polluted our waterways.
- Micro plastics at a molecular level are entering our waterways – what information is there about this, again no transparency?
- With the current rapid expansion of the industry the quantity of plastic in our marine waterways will only increase.

Pollution: there is evidence of the impact of pollution e.g. Macquarie Harbour on the West Coast. Further to this there is -

- Noise & light pollution from the salmon pens
- Damage to sea-floor e.g. benthic conditions in areas aside from Macquarie Harbour
- Anchoring damage to the sea-floor by the salmon pens

Science: the science is not being taken into consideration by the Tasmanian Parliament or Government. Issues that concern us are:-

- Resignations of two eminent scientists from the Marine Farm Planning Review Panel, following their recommendations and concerns being dismissed
- The Marine Farm Planning Review Panel process can only approve as opposed to place condition on or decline applications. It lacks rigour. The current legislation does not provide enough rigour to ensure best practice in the salmon industry in Tasmania.
- Lack of transparency: salmon deaths, outbreak of disease etc
- Lack of confidence in scientific research developed by the industry
- False claims of sustainability and health food option: Australian Marine Conservation Society stated in their documentation that Australian farmed salmon places significant stress on our oceans and we should not consume it.

Employment: the Tasmanian Parliament and the salmon industry argue that the industry contributes to employment in Tasmania.

- We believe there are false claims of employment numbers when all companies are increasing automation – see the Australian Institute report
- There are reports that a number of people on immigrant visas working for the salmon companies, as opposed to an increased number of local workers. There needs to be transparency about employment figures.
- Leasing of well boats – comes with crew e.g. Norwegian boats

Political factors: there are a range of political factors influencing the salmon industry-

- Lease conditions – same state wide (not accounting for Local Government support of industry i.e. Australian Institute Report)
- There is no legislative cap on the growth of salmon industry or no agreed end point of expansion. Currently there is only self-regulation based on adaptive management.
- There is no clear separation between Government, industry and regulators. We argue that the partnership between Government/legislation, industry and the EPA (regulation) – demonstrates it is a corrupt process.
- The lease costs to companies is minimal compared to international costs.
- \$9.3m in grants from the Tasmanian Government was awarded to the Salmon Industry in 2018.

Water: there are many issues around the use of water for the salmon industry.

- Access to fresh water: there is no transparency to how much fresh water is being used by the companies. It is a regular occurrence for the salmon companies to run out of fresh water to bathe fish and fresh water is being redirected from human consumption to the salmon industry.
- We are concerned about the usage of fresh water to bathe fish in, particularly during bush fire season. We urge the Legislative Council to seek further information regarding this issue, to ensure water availability for natural disasters such as bush fires.

CONCLUSION:

As members of South East Marine Protection (SEMP) we believe that the salmon industry in Tasmania lacks adequate legislative protection of our marine environment; lacks social licence and overall is detrimental to the Tasmanian way of life. We believe it is not sustainable, is not best practice and risks damage to brand Tasmania. Coastal waters are owned by Tasmanians and are now becoming increasingly industrialised at the expense of other water users and impacting on our food supply chain.

Further to this SEMP conducted a petition to the House of Assembly earlier this year calling for a full moratorium on any expansion to fin fish farming in Tasmanian Waters and revoking any and all fin fish leases in Frederick Henry and Norfolk Bays in Southern Tasmania. We were advised that this petition did not follow the appropriate protocols accepted by the House of Assembly, however, as you will see from the attached document, hundreds of residents in Southern Tasmania and in particular the Southern Beaches area do not support fin fish farming. We firmly believe the salmon farming industry does not have social licence to continue to expand its production.

We welcome an opportunity to present our submission to the Legislative Council during public hearings.

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on behalf of

South East Marine Protection (SEMP)