

**From:** [Josephine Murray](#)  
**To:** [FinFish](#)  
**Subject:** Salmon/Fin Fish Farming  
**Date:** Friday, 29 November 2019 12:03:40 PM

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## To whom it may concern in the Legislative Council:

All oceanic water passes through Storm Bay into the Derwent Estuary, Frederick Henry and Norfolk Bay.

These bays are prime recreational fishing and boating areas and host most of Greater Hobart and the Southern beaches.

The D'Entrecasteaux is already experiencing elevated nitrogen levels due to the presence of large nutrient input from fish farms. The urine and faecal pollution from the salmon will be around 2,296 tpa (initial expansion), then 4,592 tpa mainly in the form of dissolved nitrogen (approximately 85% of the total output is released as a solution into the water column).[1] (Derwent Estuary Program, (DEP) 2018)

Storm Bay is considered by the Derwent Estuary Program to be part of a much bigger system that includes the Derwent Estuary, the current total human output of dissolved nitrogen into the estuary is only 327 tpa.

Salmon industry modelling clearly shows that a portion of the pollution will be pushed into the Derwent Estuary, Frederick Henry and Norfolk Bay, though what percentage remains unclear. [1] Even 5% would represent a doubling of the current nutrient inputs. Any increase above current inputs will result in an increased risk of toxic algal blooms and heavy metal re-suspension. All oceanic water passes through Storm Bay into the Derwent Estuary, Frederick Henry and Norfolk Bay.

This says nothing of the farm at Okehampton Bay!! What are they doing to our supposed pristine Derwent Estuary and East Coast waterways?

Control this development now.

Steps you can take (from the Tasmanian Conservation Trust submission):

**Abolish or reform:** Abolish the current Panel or undertake a top to tail restructuring.

**Recognise social values:** Amend the Marine Farming Planning Act to explicitly require the Panel to assess and protect social values e.g. impacts on recreational boating and fishing, visual impacts and noise.

**Appeal rights:** Decisions of Panel regarding new leases and significant amendments to leases should be subject to third party appeals.

**Civil enforcement:** There should be a general civil enforcement provision, allowing any person with an interest to enforce non-compliance under the Marine Farming Planning Act.

**Panel membership:**

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.

### **Panel processes:**

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.

**Panel subject to review:** 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.

**Remove minister's veto power:** Marine Farming Planning Act should be amended to remove or substantially constrain the minister's powers to overturn decisions of the Panel.

**Integrate decisions:** Require the Panel to integrate its decisions with biosecurity requirements.

### **Environment Protection Authority**

**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.

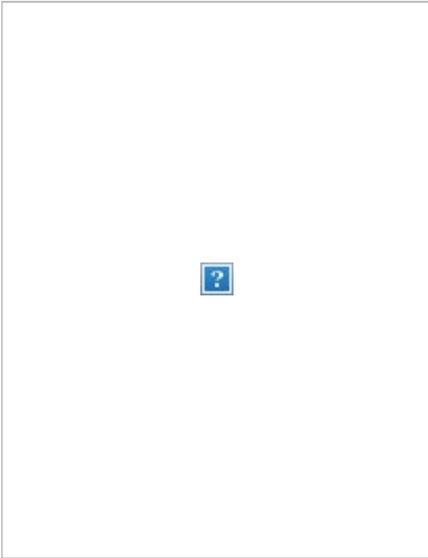
**Lease monitoring data:** There should be a requirement to publicly release individual lease monitoring data, details of compliance and enforcement activities, and other EPA decisions including decision rationale (where there are no commercial in confidence considerations).

**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.

### **Marine bio-spatial planning**

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.



### **Seal management**

The industry should be give a period of a few years maximum to have fish farm pens incorporating best practice design to minimise seal inter-reaction.

Yours sincerely

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Josephine Murray

