

Summary report of public consultation

Draft Sustainable Industry Growth Plan for the Salmon Industry

Department of Primary Industries,
Parks, Water and Environment

December 2017

[Page deliberately left blank]

Contents

1. BACKGROUND	2
(A) CONTEXT OF THE DRAFT SUSTAINABLE INDUSTRY GROWTH PLAN FOR THE SALMON INDUSTRY.....	2
(B) THE CONSULTATION PROCESS.....	2
(C) NUMBERS AND CATEGORIES	3
2. BREAKDOWN OF FEEDBACK FORMS RECEIVED	3
(A) ANALYSIS.....	3
(B) STATISTICAL BREAKDOWN	4
3. QUALITATIVE ISSUES AND RESPONSES	5
(A) SUMMARY ANALYSIS	5
(B) ISSUES AND RESPONSES.....	6
ATTACHMENT 1: SOURCE OF FEEDBACK AND COMMENTS PROVIDED THROUGH THE ONLINE FORM	13
ATTACHMENT 2: SOURCE OF SEPARATE SUBMISSIONS	16

I. Background

(a) Context of the Draft Sustainable Industry Growth Plan for the Salmon Industry

Tasmania's commercial salmon farming industry began more than 30 years ago on a very small scale. It has since grown to become Tasmania's largest single industry in the agriculture and fishing sector. Salmon farming has had very broad community support as it established itself as a well-known element of the State's brand.

In recent years the scale of the industry has generated some concerns about environmental impacts. Since 2015 significant reform of the regulatory system and legislation has occurred because these were recognised to no longer match the industry's size and complexity.

Early in 2017 the Government pledged also to develop a Sustainable Salmonid Industry Growth Plan. The purpose was to make the Tasmanian Government's expectations clear to the community and the industry, and also to provide all interested parties with the opportunity to contribute to the management of the industry's development in the State.

A draft of the Sustainable Industry Growth Plan for the Salmon Industry was released for public comment to test the Government's broad vision and the specific actions that it proposed. The consultation aimed to generate feedback to improve the Plan.

This report summarises the feedback and outlines how the Government has responded to it in finalising the Sustainable Industry Growth Plan for the Salmon Industry.

(b) The Consultation Process

The consultation period ran from 10 August to 29 September 2017. A handful of late submissions were accepted.

The Minister for Primary Industries and Water, Jeremy Rockliff, issued a media release to draw attention to the consultation and public notices were placed in the three daily newspapers on 11 August. A further advertisement in the daily newspapers on Saturday 26 August included the map from the draft Plan and announced the extension of the consultation period from 8 September to 29 September.

Material relating to the consultation was available on a dedicated webpage¹ and inquiries were taken through a special email address. The webpage provided easy access to an on-line feedback form that allowed the recording of opinions on each of the 17 actions in the draft Plan, as well as the provision of comments. It was stated that these comments would be expected to be published and people were given the choice of whether they wished their comments to be anonymous or published with their names (but no other personal information). They are being published on the webpage.

A number of people and organisations put in separate submissions, which are also being published. Less formal feedback was also sought from the ancillary sector (businesses supplying and servicing the salmon industry) through a workshop and meeting.

¹ See dpipwe.tas.gov.au/salmonplan.

(c) Numbers and categories

In total 69 feedback forms were completed, and 28 submissions were received.

The forms were provided mainly by individuals (66² out of 69), with 3 organisations represented. Environment Tasmania submitted a feedback form and also instigated a separate campaign of form-style emails sent directly to the Minister, with very similar text to the organisation's feedback form. Of the 69 forms, 63 included comments. Of these, 34 are being published with names and 29 requested anonymity.

The 28 submissions were mainly from interested organisations, including two of the main salmon farming companies and one small lease holder, and peak bodies in the wild and recreational fisheries as well as tourism. There were also submissions from several environmental organisations, a handful of businesses and local community organisations, seven interested individuals and one political party (the Tasmanian Greens).

It would appear that all the significant stakeholder groups are represented in the feedback received and that this feedback therefore provides a good indication of the wide range of views in the community about the salmon industry. The people and organisations who have contributed are listed in Attachments 1 and 2, apart from those who have requested anonymity.

2. Breakdown of feedback forms received

(a) Analysis

The overwhelming majority of people who used the online feedback form:

- responded to all questions on the form; and
- provided additional comments through the online feedback facility.

A statistical breakdown of responses to the 17 questions on the form is provided in the following subsection.

The form responses and comments, taken together, provide valuable insight into the degree of agreement or otherwise with the 17 actions for which responses were prompted, and also suggest why this is so.

Most of the 17 actions were supported. The most nearly unanimous result was 91% agreement on zero tolerance for marine debris. Twelve of the 17 had majority agreement – ie more “agree / strongly agree” than “disagree / strongly disagree”, and also more than 50% in the “Level of agreement” score. The “neutral / not sure” readings were generally about one-eighth to a quarter of responses, although in three cases this category neared a third.

In terms of disagreement, one question generated disagreement of more than 50% (78%), and two were above 40%. The clear outlier in this respect was the first question, on zoning and the map, which had agreement from 8% of respondents. This feedback strongly suggested, when taken with the accompanying comments (and submissions), that the Plan did not adequately explain the map or its context, and that some of the zoning proposals should be reconsidered. Much of the concern about the proposed zoning related to the possible effects of growth on particular areas, with many

² Strictly 64, as two individuals each made two very similar submissions. As removing one of their responses does not materially alter the feedback, they have been left in the list.

respondents taking the two shades of green in the map as indicating a literal “green light” to salmon farming in the whole of the shaded areas.

This feedback helped to generate the most significant changes to the Plan text and the map, and account for the main differences between the draft and the final versions of the Plan. The issues and changes are outlined in parts 1 and 2 of the table presented in section 3(b) below.

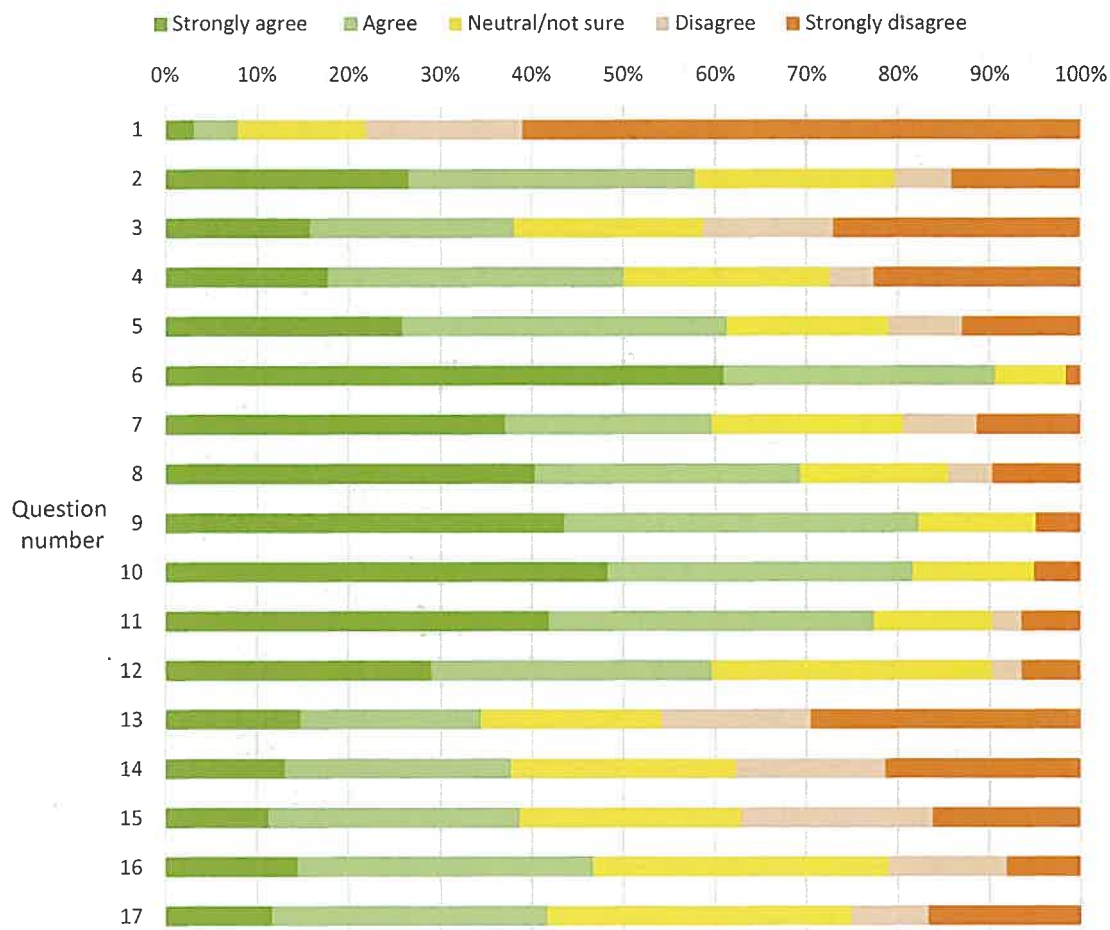
The quantitative results are presented below in a table and a graphic.

(b) Statistical breakdown – table and graphic

Topic No.	Subject	% submissions with response to this question	Strongly agree (%)	Agree (%)	Neutral / not sure (%)	Dis-agree (%)	Strongly disagree (%)	Level of agreement (%) **
	Maintaining public confidence							
1	Grow and no-grow zones	93	3	5	14	17	61	18
2	Expansion being largely oceanic	93	27	31	22	6	14	63
3	Competitive tender process	91	16	22	21	14	27	46
4	Analysis of existing MFDP areas	90	18	32	23	5	23	54
5	Agreement for Macquarie Harbour	90	26	35	18	8	13	63
6	“Zero tolerance” for debris	93	61	30	8	0	2	87
7	“Tasmanian Salmon Industry Scorecard”	90	37	23	21	8	11	67
	Environmental regulation & biosecurity							
8	Compliance and Monitoring Unit	90	40	29	16	5	10	71
9	Environmental information	90	44	39	13	0	5	79
10	R&D to reduce environmental impact	87	48	33	13	0	5	80
11	Biosecurity Program	90	42	35	13	3	6	76
12	Key fish health and biosecurity assets	90	29	31	31	3	6	68
	Supporting industry growth							
13	Commitment to sustainable growth	88	15	20	20	16	30	43
14	Research, development and innovation	88	13	25	25	16	21	48
15	Marketing and export development	90	11	27	24	21	16	49
16	Skills and career development	90	15	32	32	13	8	58
17	Representative industry body	87	12	30	33	8	17	53

** **Level of agreement** is averaged on the basis of the following weightings: ‘Strongly agree’ - 100%; ‘Agree’ – 75%; ‘Neutral/not sure’ – 50%; ‘Disagree’ – 25%; and ‘Strongly disagree’ – 0%

Distribution of responses to questions



3. Qualitative issues and responses

(a) Summary analysis

The following table lists each significant discrete issue raised and the response to it.

The issues have been collated from both the online comment facility and the individual submissions. They have been carefully considered by the Government, and the following table outlines and explains the Government's responses to each issue.

In response to the consultation, a significant new section has been added to the text, and many other amendments have been made to the map and parts of the text. The consultation process has therefore very usefully improved the Plan.

(b) Issues and responses

Issues raised	Government's response
<p>I: Map / zoning / planning issues – general</p>	
<p><u>I(a) Intent and meaning of “Grow zones”</u></p> <ul style="list-style-type: none"> • Feedback suggested that more detail in the Plan is required to explain the intent of the 2 different types of “Grow zones”. This includes a need for further clarification as to what the process will be in the future to determine whether or not salmon farming will ever be able to occur in these zones. • There was also feedback about the potential impacts of grow zones on (a) commercial fishers and other marine farms; (b) recreational fishers; (c) amenity generally (noise, light, navigation, views, tourism generally); and (d) environmental values. 	<ul style="list-style-type: none"> • The Plan has been amended to better differentiate between grow zones that are currently being explored through research permits or are already in the planning process, and those which have potential in the future but where there are no current plans. To accommodate this, 4 new pages of text, accompanying the map, have been added and areas which may be considered under a competitive process in the future have been coloured blue. <ul style="list-style-type: none"> ○ The 2 pages before the map outline the basics of the marine farming planning and approval system, as amended by the recently passed <i>Finfish Farming Environmental Regulation Act 2017</i> and conducted by or with the advice of the Marine Farming Planning Review Panel. The text summarises the key elements of the planning and approvals framework, and lays out the steps that must be gone through in order to progress to actual marine farming in water not previously zoned for finfish farming. It includes a note on how the public may participate. ○ The 2 pages following the map explain in more detail what the various coloured zones mean, as well as the “inactive” versus “active” finfish zones shown on the map. • The Plan has been amended to explain clearly that there are many steps to be taken between initial investigations and farming operations. In particular, the new text indicates how the required environmental impact statements (EISs), prepared in compliance with detailed guidelines covering all relevant considerations, ensure that decisions are fully informed and open to public representations. • The Government has also committed to release the template for the EISs, noting that some site-specific detail will vary a little in different sites.

Issues raised	Government's response
<p><u>1(b) Future planning should require the application of certain decision filters</u></p> <ul style="list-style-type: none"> Feedback was received expressing the need for a change to the planning process to include clearer criteria for salmon farming to be approved and “decision filters” to be used in the planning process. 	<ul style="list-style-type: none"> The Plan has been amended to indicate clearly that the current planning system already provides for considering these issues. The new text specifies how this is done through the EIS guidelines in particular. The Plan has been amended to clearly state the Government's intentions and expectations are met by ongoing implementation of the current statutory process, recently strengthened by amendments to the <i>Environmental Management and Pollution Control Act 1994</i> and the <i>Marine Farming Planning Act 1995</i>. The Plan further states that environmental issues are now under the oversight of the independent Environment Protection Authority and EPA Director and that interactions with other marine industries and activities (including fisheries and tourism), and impacts on the coastal population and amenity generally, are covered by the Marine Farming Planning Review Panel's processes.
<p><u>1(c) Need to define “oceanic”</u></p> <ul style="list-style-type: none"> Submissions queried the use of the terms “oceanic” and “offshore” and sought clear definitions, including the potential for strict criteria such as distance from land, water depth, wave energy, current flow or tidal influence. 	<ul style="list-style-type: none"> The Plan already emphasises the clear intent that future expansion will be oceanic, rather than estuarine. The Plan has been amended to include a brief definition of what the Government means by oceanic in this Plan.
2: Map / zoning / planning issues – specific	
<p><u>2(a) Provide better protection for the Actaeons reef system and other inshore waters to the south and west of Bruny Island</u></p> <ul style="list-style-type: none"> Feedback was obtained from wild abalone fishers and other commercial fishers that a larger “No grow zone” is required over the Actaeons reef system and other inshore water to the south and west of Bruny Island Wild abalone fishers also requested a fixed buffer distance of 1.5 nautical miles between reefs and salmon farms. 	<ul style="list-style-type: none"> It is acknowledged that the “No grow zone” over the core of the Actaeons in the draft Plan was inadequate and failed to cover the reef system; it has been extended. On review of fishery data and reef mapping, it has been agreed that not only the Actaeons, but also some reefs around Cloudy Bay and the Labillardiere Peninsula should be included in the “No grow zone”. The Plan has also been amended to reinforce that salmon farming is not permitted over hard bottom. The Government considers that the desired outcomes sought through a 1.5 nautical mile buffer can be accommodated through the requirement for the planning process to ensure reasonable separation distances that are appropriate for specific sites.

Issues raised	Government's response
<p><u>2(b) Concerns that the "Grow zones" would adversely affect traditional scallop fishing grounds</u></p> <ul style="list-style-type: none"> Scallop fishers expressed concerns about the impact of salmon farming on scallop fishing in the far North-West, King Island and the Furneaux Group. 	<ul style="list-style-type: none"> In the far North-West the shading has been modified to indicate specifically the area of realistic interest to Petuna. The area now shaded green represents the deeper water (>15 m). Around King Island, the entire west coast is now a "No grow zone". In the Furneaux Group, the formerly dark green zone has been changed to a "No grow zone" including the entire east coast of Flinders Island.
<p><u>2(c) Further "No grow zone" off the south-east coast of Bruny Island.</u></p> <ul style="list-style-type: none"> Pennicott Wilderness Journeys have requested a further "No grow zone" of at least 5 km off the southeast coast of Bruny Island. 	<ul style="list-style-type: none"> The Government is confident that the planning process is well adapted to consider and resolve the issues raised by the intersection of this established business and the preliminary investigations of salmon farming potential. The matter is best left to that process (as well as direct negotiations between the parties).
<p><u>2(d) Adjust proposed zone boundaries to acknowledge Tassal's recent permit for environmental monitoring east of King Island</u></p> <ul style="list-style-type: none"> The processes for the King Island permit was only slightly behind those of the other two major companies. However, the permit was not formally in place at the time the draft Plan was released. Feedback indicated the permit area should be light green and not distinguished from areas being investigated by other companies working under similar permits. 	<ul style="list-style-type: none"> The map now shows the area of coast subject to the permit as green.
<p>3: Other issues</p>	
<p><u>3(a) Greater emphasis on biosecurity issues</u></p> <ul style="list-style-type: none"> Some submissions urged greater focus on biosecurity, including the need to acknowledge it will probably require legislative change to provide powers necessary for best practice biosecurity. 	<ul style="list-style-type: none"> The Plan already highlights biosecurity, but it is recognised that the point could be made even more strongly. The text is amended slightly where appropriate, and the main biosecurity action made more prominent in the order of actions. The Plan also notes that the revised Biosecurity Program may need legislative powers, as well as continuing to tie this to the Government's forthcoming biosecurity legislation.
<p><u>3(b) Provide greater detail on proposed tender process</u></p> <ul style="list-style-type: none"> Several submissions urged provision of more detail on how the tender process would operate. 	<ul style="list-style-type: none"> The text and graphic has been modified for clarity. Further detail will be developed in consultation with stakeholders through the legislative process. This will be a key implementation priority.

Issues raised	Government's response
<p><u>3(c) Government to positively encourage trading of leases to facilitate consolidation</u></p> <ul style="list-style-type: none"> It has been suggested that the proposed review of marine farming development plan areas, particularly with a view to improve biosecurity, should be broadened to consider issues such as general environmental health (including cumulative impacts) and operational efficiency. 	<ul style="list-style-type: none"> The Plan's primary focus on biosecurity remains. The Government will consider any consolidation proposals on other grounds, if brought forward with industry agreement.
<p><u>3(d) Compensation via some form of offset where marine farming affects recreational fishing</u></p> <ul style="list-style-type: none"> This is the stated position of the Tasmanian Association for Recreational Fishing. 	<ul style="list-style-type: none"> There are practical and legal difficulties making such an "offset" policy enforceable. However, there are currently no barriers to companies adopting such an approach. There may be scope within the new tender process for the companies themselves to include "community service obligations" as part of their submission to the Tender Advisory Board.
<p><u>3(e) Establish milestones for implementation of Plan</u></p>	<ul style="list-style-type: none"> This is agreed and a slight amendment has been made. It will be part of the task for the broad-based industry reference group.
<p><u>3(f) Proposed "portal" and access to environmental information including IMAS role and funding:</u></p> <ul style="list-style-type: none"> Suggestions include increased funding to IMAS and improvements to the Broadscale Environmental Monitoring Program. 	<ul style="list-style-type: none"> The design of the new portal will be negotiated with IMAS through the implementation process. Any specific funding proposals will be considered by government through normal budget processes.
<p><u>3(g) Proposed "Scorecard" should use independent data (eg Aquaculture Stewardship Council) and be managed at arm's length</u></p> <ul style="list-style-type: none"> It is suggested that the scorecard use existing data rather than create new requirements, and perhaps be managed by a third party such as IMAS. 	<ul style="list-style-type: none"> The approach to the development of the scorecard will be developed in consultation with the industry reference group, IMAS and the EPA.
<p><u>3(h) Debris – need for transition period</u></p> <ul style="list-style-type: none"> Some feedback suggested that that because it will not be possible to have all gear traceable immediately, the zero tolerance policy will not be immediately enforceable. 	<ul style="list-style-type: none"> This is acknowledged as a practical reality, but the Plan outlines that deadlines for full compliance will be set. This will be another task for consideration by the industry reference group.
<p><u>3(i) Baseline environmental assessment of reefs close to proposed marine farming zones</u></p> <ul style="list-style-type: none"> Some feedback proposed a baseline environmental assessment of reefs close to proposed MF zones. 	<ul style="list-style-type: none"> The Plan has been amended to confirm that this is in fact already built into the requirements for environmental impact statements (EISs).

Issues raised	Government's response
<p><u>3(j) Acknowledge climate change risk</u></p> <ul style="list-style-type: none"> Some feedback asked for a greater focus on the effects of climate change – including especially warmer waters, increased storm activity and changing marine life due to shifting currents – which are argued to pose a major risk to continuing and future marine farming. 	<ul style="list-style-type: none"> The Plan has been amended and climate change is now mentioned in relation to the planning process, noting it is specifically required to be addressed in EISs.
<p><u>3(k) Change wording in relation to benchmarking</u></p> <ul style="list-style-type: none"> Some feedback argued the use of “best” rather than “good” practice in relation to benchmarking. 	<ul style="list-style-type: none"> The Plan has been amended to recognise this point. The text now refers to “best practice” and benchmarks “that are relevant in the Tasmanian context”.
<p><u>3(l) Protection of seawater pump-dependent terrestrial abalone farms</u></p> <ul style="list-style-type: none"> Specific feedback was received relating to the accepted technology of operating land-based abalone farms that rely on pumped seawater. 	<ul style="list-style-type: none"> This issue is covered by existing planning requirements, but a brief reference has been added in the Plan.
<p><u>3(m) Facilitate industry opportunities for Aboriginal Tasmanians</u></p> <ul style="list-style-type: none"> It has been suggested that the salmon industry offers specific opportunities to improve skills and employment for Aboriginal Tasmanians. 	<ul style="list-style-type: none"> The Government agrees there are significant opportunities for improved skills and employment for Aboriginal Tasmanians. The industry's workforce development plan is being updated, and a reference to Aboriginal opportunities is now included.
<p><u>3(n) New offshore constitutional settlement (OCS) to allow extended State management of marine farming</u></p> <ul style="list-style-type: none"> Under State law, the State can manage marine farming only to the extent of State waters (which extend 3 nautical miles from the coastline or from a “baseline” that takes account of bays and offshore Tasmanian islands). Beyond State waters, the Australian Government has jurisdiction over Commonwealth waters. 	<ul style="list-style-type: none"> With the move to farming further offshore, this is becoming a practical issue for Tasmania. There is a current proposal under development in Commonwealth-State / Territory discussions to progress this by amendment of the relevant Commonwealth law, allowing States to regulate marine farming in adjoining Commonwealth waters. The Plan now notes that the Government is committed to supporting this proposal.
<p><u>3(o) Delay Plan</u></p> <ul style="list-style-type: none"> It was suggested the Plan should be held back to allow broader and longer consultation and consideration of stakeholder and expert views. 	<ul style="list-style-type: none"> The Government extended the consultation period on the Plan from 4 to 7 weeks.

Issues raised	Government's response
<p><u>3(p) Withdraw proposed zones and start again</u></p> <ul style="list-style-type: none"> It was suggested that the zones should be set on the basis of a "proper planning process" based on (eg) bioregional issues, identification of conservation values, carrying capacity studies, community input etc. 	<ul style="list-style-type: none"> The Government has consulted widely on the Plan with the intent of providing certainty to the Tasmanian community in a timely manner. The Plan will be reviewed biennially. The proposed zones have been determined by weighing up three important considerations: <ul style="list-style-type: none"> the advice of industry and government on where salmon farming is and isn't technically feasible; the advice of industry on where it sees opportunities for sustainable growth; and listening to public concerns about where salmon farming should and should not occur. The new text in the Plan now more fully explains this process and the different zoning. The Government is confident that the industry is sufficiently mature to be able to focus on the areas where conditions may be appropriate for expanded farming. Any such expansion is still subject to the full planning and approval process, which will address the issues raised, and future proposals in untested areas will require the new competitive tender process.
<p><u>3(q) Undertake further governance reforms</u></p> <ul style="list-style-type: none"> Various suggestions have been made for further reforms of governance, most fully by Huon Aquaculture Company, which proposes a dedicated Finfish Aquaculture Regulator, as well as the revival of the Board of Advice and Reference, use of the environment protection policy (EPP) mechanism and rejection of the new Environmental Licence. 	<ul style="list-style-type: none"> The Government respects the intent and approach underlying such proposals, but has reached the carefully considered conclusion that the aim of effective modern regulation can be attained through the reforms recently introduced in the <i>Finfish Farming Environmental Regulation Act 2017</i>. This major set of reforms has just been debated and passed by the Parliament, following a public consultation process, and should be given the opportunity to be implemented and properly assessed. The Government has confidence in the EPA Board and Director to oversee the industry's environmental regulation but will of course be fully prepared to assess the success of the new arrangements once they have had a chance to bed down. The Plan includes a proposal to introduce a Tender Advisory Board to provide independent advice on the new tender process for access to new farming areas.

Issues raised	Government's response
<p><u>3(r) Introduce a review process for "No grow zones", possibly statutory</u></p> <ul style="list-style-type: none"> Some feedback suggested the creation of "No grow zones" may become unnecessarily restrictive and therefore proposed a legislatively mandated review of the "No grow zones". 	<ul style="list-style-type: none"> The Government has committed to providing certainty by clearly indicating where salmon farming will and will not be undertaken in Tasmania's waterways. The Government believes that the introduction of a mandated review would create unnecessary uncertainty. Further, the legislation already provides for a process to create or revoke "No grow zones" (and thus also to amend them) through the Parliament.
<p><u>3(s) Broaden membership of proposed broad-based industry reference group</u></p> <ul style="list-style-type: none"> Various proposals have been put forward, often to include representatives of the party making the suggestion – eg to include commercial and recreational fishers, local government, environmental groups, community, scientific or conservation experts etc. 	<ul style="list-style-type: none"> The body proposed in the Plan is designed to be efficiently focussed on the limited task of overseeing the Plan's implementation. A large and amorphous body would risk becoming unworkable. The various other interests / expertise proposed will continue to have input through the planning process.
<p><u>3(t) Change make-up of Marine Farming Planning Review Panel</u></p> <ul style="list-style-type: none"> Some feedback suggested the Panel should include, in particular, more representation of science and community. 	<ul style="list-style-type: none"> The MFPR Panel has recently been the subject of amendments passed by the Parliament through the <i>Finfish Farming Environmental Regulation Act 2017</i>, which increase scientific representation.
<p><u>3(u) Plan should acknowledge environmental damage already done</u></p> <ul style="list-style-type: none"> Some feedback argued that the Plan should include an acknowledgment of the widespread damage done by existing marine farming, which has been the basis for the increase in public concern about the regulation of the industry. 	<ul style="list-style-type: none"> The Plan acknowledges that it is time to update and improve the regulation of the industry, and notes that the Plan comes on top of a series of important reforms culminating in the <i>Finfish Farming Environmental Regulation Act 2017</i>. However, the Government does not accept many of the assertions made in submissions about the effects of marine farming. It is confident that: <ul style="list-style-type: none"> a) not all effects attributed to marine farming are caused by it, given other factors such as warming waters, changing currents etc; and b) impacts can be managed under an adaptive management approach and are temporary rather than permanent; the Plan will facilitate natural recovery processes.
<p><u>3(v) Salmon farming should be by "closed loop"</u></p> <ul style="list-style-type: none"> Some feedback suggested that in order to be environmentally secure and to minimise impacts all salmon farming should be closed loop and land based. 	<ul style="list-style-type: none"> The Plan notes that more of the life cycle of farmed salmon is likely to occur on land. However, fully land-based production is unlikely to be a commercial proposition in Tasmania as a replacement for our current industry. The Government believes that commercially viable production in Tasmania is always likely to depend significantly on the brand advantages of operating in the State's natural marine environment. These advantages would be forgone completely by moving to production of a standardised commodity.

Attachment 1: Source of feedback and comments provided through the online form

No.(starts at 2)	Name, or anonymous, or no comments made
2	No comments
3	Anonymous
4	Darren Briggs
5	Bradley Hardy
6	Anonymous
7	Chris Wells
8	No comments
9	Hans Wapstra
10	Anonymous
11	Anonymous
12	Anonymous
13	Anonymous
14	Anonymous
15	No comments
16	Anonymous
17	Ingerlise Armand
18	Juliet Quarterman
19	James Michael
20	Matthew Morgan
21	Ken Burrridge
22	No comments
23	Stephen Pawlus
24	Robert Rattray
25	Tony Jaeger
26	Anonymous
27	Anonymous
28	Anonymous
29	Steven Brinkhoff
30	Anonymous
31	Greg Baxter
32	Greg Gill
33	Rosalind Lorenz

No.(starts at 2)	Name, or anonymous, or no comments made
34	Anonymous
35	Anonymous
36	Tony Jaeger [second submission – see 25]
37	Ingerlise Armand [second submission – see 17]
38	Garry Ridler
39	Justin Febey
40	Anonymous
41	Anonymous
42	John Stanfield
43	Anonymous
44	Christopher Massie
45	Anonymous
46	Laura Kelly (Environment Tasmania)
47	No comments
48	Anonymous
49	Anonymous
50	Anonymous
51	No comments
52	Ian Murphy
53	Geoff Baker
54	Andrew Boon
55	Anonymous
56	No comments
57	Anonymous
58	Susan Hood
59	Diane Lester
60	Claire Gilmour
61	Christopher Knight
62	Peter Meloy
63	Christine Coughanowr (Derwent Estuary Program Ltd)
64	Denis Edwards (Anglers Alliance Tasmania)
65	Anonymous
66	Jennifer Hadaway
67	Anonymous

No.(starts at 2)	Name, or anonymous, or no comments made
68	Anonymous
69	No comments
70	Anonymous

Totals: **Named – 34; Anonymous – 27; No comment – 8. TOTAL = 69**

Attachment 2: Source of separate submissions

Number	Name of submitter ³	Type
1	Bob Lister, CEO, Scallop Fishermen's Association	Peak body – fishery
2	Stuart Richey, Managing Director, Richey Fishing Co. Pty Ltd	Co. – fishery
3	Anonymous	Individual
4	JST Abalone Pty Ltd	Co. – fishery
5	William Alstergren and Kate Alstergren, Directors, Alstergren Aquaculture Pty Ltd	Salmon Co.
6	David Wood, A/g CEO, Petuna Pty Ltd	Salmon Co.
7	Julian Harrington, CEO, Tasmanian Seafood Industry Council	Peak body – fishery
8	D'Entrecasteaux and Huon Collaboration	Local community organisation
9	WWF	Environmental non-government organisation (ENGO)
10	John Wells	Individual
11	NRM South	Local community organisation
12	Tony Peach & Michael Foley	Individual
13	Friends of N Bruny	ENGO
14	Rebecca Tyers	Individual
15	Birdlife Tasmania	ENGO
16	Huon Resource Development Group	Local community organisation
17	TARFish	Peak body – fishery
18	EDO	ENGO
19	Tasmanian Greens	Political party
20	Pennicott Wilderness Journeys	Co – tourism
21	Ian Locke	Individual
22	Huon Aquaculture Company	Salmon Co.
23	Tasmanian Abalone Council Ltd	Peak body – fishery
24	Sharon Moore	Individual
25	TCT	ENGO
26	John & Susan Wardle	Individual
27	Australian Abalone Growers Association	Peak body – fishery
28	Tourism Industry Council Tasmania	Peak body – tourism

³ All personal details other than names are redacted from individual submissions. One requested that their name not be published.

Category	Number
Peak body – fishery	5
Salmon Co.	3
Co. – fishery	2
ENGO	5
Local community organisation	3
Peak body – tourism	1
Co. – tourism	1
Political party	1
Individual	7
TOTAL	28