

SUBMISSION TO THE INQUIRY INTO FIN FISH FARMING IN TASMANIA

LEGISLATIVE COUNCIL INQUIRY - COMMITTEE 'A'

**Submitted by Jennifer Hadaway
Dover Tasmania**

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Implementation of the Sustainable Industry Growth Plan for the Salmon Industry:

Data Collection and Publication:

In the 'One Year Review of the Sustainable Industry Growth Plan' (DPIPWE 2018) Minister, Guy Barnett states in his Forward:

Growth should be achieved in a sustainable, transparent and accountable way. He continues saying, "Growth should be underpinned by clear and robust mechanisms for expansion, as well as continuous improvement in environmental performance."

The Minister then comments he is pleased to report encouraging progress against initiatives in the Plan but he omits any comment about data collection and publication.

There has always been a lack of data about the Salmon industry. There has always been widespread distrust because of this.

Ordinary Tasmanian citizens want data that explains the where and how of the industry now and what expansion really means. There will remain limited community acceptance of any government plans until the community is consulted about and honestly informed about, the present bottom line.

It would sit well with Minister Barnett to ensure he acts on behalf of his constituents and provides them with the truth of the Salmon industry rather than support the companies in what many see as their purposeful obfuscation.

It is almost impossible to find relevant statistics, plans or reports on either State Government web-sites or on those of the Salmon industry companies.

Information seems inconsistent, poorly displayed, often inaccurate and out of date, not scientifically based and at times incongruous.

It is impossible to compare or judge between companies. Information is under different topics although it might be about similar matters. Information is often in pseudo- scientific language which is hard to comprehend. Information often appears without reason or explanation about where it has come from or why it is there and is quite commonly without a reference or a date. It is also impossible to know what government regulations or controls are applicable to any given circumstance outlined on the web-sites.

It would help if there was a simple system, developed so that each company could be reviewed regarding their independent claims and then be compared for the same matters in the same time frame as their opposition. A comparative chart on the DPIPWE web-site, with appropriate headings and updated monthly would be effective. Reference to the legislation governing matters listed could be added as required and would provide a starting point for those wanting further information.

Base line data and current, Salmon industry activity should also be published in the media so there is the opportunity for regular, public review and comment by those who do not feel comfortable responding to on-line sites. If DPIPWE developed an on-line comparison as suggested above, hard copy could be published at the same time, to encourage community understanding and involvement.

It is clear that neither the Salmon companies nor the government want to hear about community concerns and so don't publish data or request feedback that will require a response. Until there is recognition of the people's views there will continue to be distrust, dislike and active challenges raised against the industry.

The difficulty in finding data, analysing and responding to it also raises the question of is there any?

There is a growing number of people who believe the Salmon industry has no relevant data, is not really required to meet any standards, flies by the seat of its pants and has carte blanche to continue trashing the local environment, marine and land based for the benefit of a few. Release of assessment of and reporting on readily available data, particularly data updates of environmental impacts, would do much to develop some faith in this government and its questionable support for this environmentally unsustainable industry.

Progress in the Development of an Industry Wide Bio-security Plan:

Page 3: Action 3 of the 'One Year Review of the Sustainable Industry Growth Plan' (cited above) states an analysis by industry and DPIPW of 'Finfish Farming Areas' has progressed and "This will inform the proposed Biosecurity Program". What has actually progressed is not stated. How the information will be applied is not stated. What environmental assessment will be required is not stated. Community involvement or consultation is not mentioned.

Real time data about the preparation and content of an industry wide bio-security plan is hard to find. Most references to such a plan are cross referenced to other plans, information and Acts. The relationships between reports and the sources of information are hard to follow as many papers are undated, do not clarify the reason for their production and do not declare an author.

See below comment re the Marine Farming Planning ACT 1995 because the links between this Act and an industry wide biosecurity plan are clear.

It would be good to have a developmental index of where the Salmon industry bio-security plan is at now, with a summary of research applied to date, the consultation process followed and the expected impact on the Salmon industry of the Biosecurity Act 2019.

Application of the Marine Farming Planning Act 1995

This Act requires complete revision.

The Salmon industry has changed markedly since 1995. Community expectations and the requirements for the Salmon industry to consult and earn a social licence, are becoming imperatives that neither the government nor the industry can ignore.

Climate change, environmental management, visual pollution of Tasmania and the growth of the Tourism industry are just four influences that are not applied to the present Act but are already having an effect on the Salmon industry.

The main reason for the Planning Act to be revised is the growing demand from the general community for transparency about process and legislation of the Salmon industry because it is having an ever more obvious effect on their lives and lifestyles.

The Act itself is difficult to understand. It requires referral to other papers, reports and Acts and contains irrelevant controls and out of date processes.

The 'Sustainable Industry Growth Plan for the Salmon Industry' does begin to examine a process that would support the revision of the Marine Farming Planning ACT 1995.

Pages 19 – 21 of the Growth Plan make mention of "industry and government to:

- Analyse existing inshore finfish leases
- Improve management of biosecurity
- And possibly operational efficiency"

The analysis, improvement and efficiency however need to be done openly and transparently so there is no chance of overt industry or government bias and community input is acknowledged. The clear statement that this is to be “an industry led analysis” is a continuation of the past and must be altered to reflect a way forward with community consent.

There is also a reference to:

“Government will consider proposals from industryby adjusting lease locations within zones or exchanging leases between companies or consolidation proposals for other reasons if agreed by all affected parties”.

Where is the independent umpire? Where is the environmental data? Where is the planning and what are the guidelines that ensure Macquarie Harbour cannot happen again?

Government has to stand aside from its protectionist attitude to the Salmon industry and pay careful attention to what the people are saying, e.g.

The Marine Farming Planning Review Panel is a joke. It needs to be disbanded and reconstituted focussing on independent, scientifically qualified members, including equal representation from the community and conservation groups. It should function without government representatives and report to the EPA. All public matters should be reported openly and transcripts of meetings publicised.

There should be a review process, possibly through the Tasmanian Planning Commission (able to make recommendations), adopted as required.

No licences either for marine or land based developments should be issued until independent, scientifically based environmental studies have been completed and the outcome, including emergency management is agreed to by the community.

Licences must clearly state the planned cap on pollutants, including biomass, dissolved nitrogen, soil run off (where applicable) and how the farm will monitor these and report to the local community.

It is imperative that all proposed new Salmon farming areas undergo rigorous assessment of water quality, visual amenity, recreational use, and consideration of noise and light pollution on the local community.

There must be a process easily understood and mandated so ordinary people can bring their concerns to be heard.

Such things as fish deaths, fish escapes, disease outbreaks, marine debris, endangered wildlife, pollution of the area should be able to be reported by a single phone call or email with the certainty that these concerns will be treated quickly and will generate timely feedback to reduce repetition of the same problem in the future.

The Marine Farming Review Panel if constituted as suggested, could be given responsibility as an interface between the government, the industry and the community.

It could for example:

Decide on new leases and changes to existing leases.

Protect the social values and recreational activities of local communities.

Recommend actions to repair damage to communities.

Prevent the expansion of Salmon farms, especially in rural areas without appropriate planning permits from local councils and by simply taking over additional area whether marine or land based.

The Marine Farming Planning Act should at the very least be amended to remove the Minister's powers to overturn decisions of the Review Panel and grant the panel the authority to liaise with the EPA directly as required and agreed to by the panel.

The drafting of all legislation from now forward must be a public, transparent process which involves local communities, Salmon farmers, scientific experts and finally government. It would be good to know this actually occurred, who was involved where, and what the outcome was. Media notification, comment and responses about changes to the Marine Farming and Planning ACT would be timely.

I am available if required to provide further information and to speak to my submission.

Yours Faithfully,

Jen

J J Hadaway (Mrs)

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