

From: [Tom Allen](#)
To: [FinFish](#)
Subject: Wilderness Society fin fish inquiry submission, Tassal hatchery
Date: Wednesday, 6 November 2019 6:24:16 AM

Dear Mr Wright

I hope you are well.

This email constitutes a submission by the Wilderness Society Tasmania to the fin fish inquiry and focuses on the proposed Tassal hatchery at Meadowbank Lake. This submission is squarely within the terms of reference, which cover "preparation and approval process" for aquaculture, including "farming development plans".

Our submission is 100% about the aquaculture planning process, in this instance regarding an aquaculture planning proposal at Meadowbank Lake.

I would be grateful if you could confirm receipt and that our submission has been submitted to the inquiry.

Wilderness Society Tasmania submission:

This submission relates to the proposed Tassal hatchery at Meadowbank Lake. The official planning application to Central Highlands Council can be found here: <https://epa.tas.gov.au/assessment/assessments/tassal-operations-pty-ltd-hamilton-recirculatory-aquaculture-system-hatchery-ouse>

We believe the following to be the case:

1. First, the big picture. The decline of nature is at hand through the unsustainable practices of humans.
2. We are in the new era of the Anthropocene, marked not just by climate change but by droughts, floods, the extinction crisis and unprecedented soil erosion, among a large number of other environmental declines. (Please refer to [this new paper](#), endorsed by 11,000 scientists and calling for urgent action to turn around the decline of nature. Yes, this paper is relevant to the fin fish inquiry and says, for example that "We must protect and restore Earth's ecosystems. Phytoplankton, coral reefs, forests, savannas, grasslands, wetlands, peatlands, soils, mangroves, and sea grasses contribute greatly to sequestration of atmospheric CO₂"
3. Even if these were not the contexts, it is our view that Tassal's proposed hatchery will lead to the pollution and degradation of Meadowbank Lake, a lake it is currently clean enough for people to drink from, which is exactly what people do.
4. In principle, we support land-based aquaculture over marine aquaculture but this cannot be at the expense of ecosystem integrity.
5. There are 320 known and recorded species within a five-kilometre radius of the lake (Atlas of Living Australia, https://biocache.ala.org.au/explore/your-area#-42.5397|146.7364|12|ALL_SPECIES)
6. A depressing number of these species are critically endangered or endangered or threatened and these include but are not limited to the following:
 1. grey goshawk
 2. wedge-tailed eagle
 3. eucalyptus ovata woodland
 4. bitter cryptandra
 5. eastern quoll
 6. eastern barred bandicoot

7. platypus
 8. Tasmanian devil,
 9. spotted tailed quoll
 10. Giant Freshwater Crayfish
7. There are a number of other species that have previously been recorded as having a status that is not threatened but whose populations are in decline. The southern brown bandicoot can represent these species. Its status is not recorded as threatened yet its population is in decline, such that it becoming a species that will, in the future, be recorded as threatened seems likely.
(Ref: <https://bie.ala.org.au/species/urn:lsid:biodiversity.org.au:afd:taxon:241463eb-b202-4095-9eea-2bcbfc7f999b>) This is the case for a significant number of those 320 known/recorded species.
 8. The point here is that, if or when Meadowbank Lake and the surrounding waterways were to become polluted as a result of Tassal's practices, the vitality of many of these species would be negatively impacted.
 9. There is a web of protected waterways that flow into the lake
 10. The previous Development Applications submitted by Tassal appear designed to deceive the local community because they didn't refer to a hatchery and described only "typical agricultural use", which is clearly not the case. This is proven because Tassal, through this DA is seeking to change the classification of the pumpstation from "agriculture" to "utilities"
 11. Lake Meadowbank is covered by a Special Area Plan (<https://iplan.tas.gov.au/pages/plan/book.aspx?exhibit=chiips>)
 12. conditions of this Special Area Plan include the following
 1. to "maintain and enhance"... "habitat for biodiversity, water quality and soil resource... where possible"
 2. Buildings and [works](#) have sufficient separation from Lake Meadowbank to protect water quality and the rural character of the setting.
 3. Aquatic structures will be sited to take into account natural values, cultural values and the intention to limit the number of aquatic structures at the lake.
 13. As seems to be standard practice of corporate vested interests abusing Tasmania's planning system, having lodged a DA for a "3m x 4m shed" in its first DA, having got this DA approved, the subsequent DA describes a massively expanded shed that is "20m x 12m x 4.8m" - a huge industrial shed in a picturesque area covered by a Special Area Plan designed to protect the natural and rural aspect of this region.
 14. The pumpstation, which is proposed to run 24 hours a day, seven days a week, will cause significant noise pollution in a highly rural area
 15. There are many protected local rivulets that feed into Lake Meadowbank. The proposed hatchery appears to be proposed to cut across these very same waterways despite them being Waterway and Coastal Protection Areas
 16. Waterway and Coastal Protection Areas are covered by the Central Highlands Interim Planning Scheme 2015 "to ensure that buildings and works in proximity to a waterway... will not have an unnecessary or unacceptable impact on natural values".
 17. It would seem impossible to reconcile the stated protected status of these waterways with the proposed hatchery
 18. the hatchery is proposed to grow about 9.5 million individual fish annually.
 19. this amounts to over 4,000 tonnes of fish
 20. These numbers appears to be uncapped and we note Tassal's strategic priority is "maximising shareholder value" through growth (<http://tassalgroup.com.au/about-us/strategy/>)
 21. The DA does not appear to quantify the total amount of effluent that the hatchery

will generate

22. Central Highlands Council describes Lake Meadowbank as "the last major storage in the drinking water catchment for the Greater Hobart Area" (ref: p11, <http://centralhighlands.tas.gov.au/wp-content/uploads/Meadowbank-Report.pdf>)
23. Water that has been polluted by fish feed, fish faeces and presumably bacteria as well as other matter will have solids removed but that this still-polluted water would be sprayed on the land. This polluted water will inevitably end up in local waterways and Lake Meadowbank.
24. "management of irrigation" will be outsourced by Tassal to a third party.
25. because Tassal intends to spraying salt water used in the hatchery onto the land, this will harm soils and increase run off.
26. Tassal proposes to dump the human effluent of staff at the proposed hatchery on the surrounding land, which is inevitably also end up in local waterways and Lake Meadowbank.
27. The DA admits that there is the prospect of algal blooms caused by polluted run off and which, "produce dangerous toxins that may cause chronic sickness and even death to animals and humans if the water is consumed or comes into contact with skin"
28. This area is increasingly drought prone and water sensitive and Tassal is proposing to suck up 650 megalitres of water - more if they want to grow this aspect of their business, and their overall aim is to "maximise shareholder growth"
29. We note that, despite promises of "world's best practice" aquaculture before Tassal moved in to Macquarie Harbour, the harbour was profoundly trashed (<https://www.abc.net.au/news/2017-06-08/how-salmon-farming-got-to-push-macquarie-harbour-to-the-limit/8349342>)
30. We note also that in other jurisdictions, such as Norway, instead of aquaculture being subsidised by taxpayers, salmon producers pay millions to lease public waterways and that money is given directly to local communities (<https://www.tai.org.au/content/tasmanians-missing-out-revenue-fish-farms>)

Ends.

Warm regards, Tom

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I acknowledge the palawa people as the Traditional Owners and ongoing custodians of lutruwita / Tasmania. I pay my respects to their Elders past and present. And I acknowledge that sovereignty was never ceded.