From:	Tasmanian Alliance for Marine Protection
To:	Tasmanian Salmon Study Secretariat
Subject:	Submission to the Independent Study of the Tasmanian Salmon Industry
Date:	Thursday, 2 July 2026 11:51:30 PM
Attachments:	TAMP submission-2026 Independent Study of the Tasmanian Salmon Industry.pdf
Importance:	High

Attention: Dr Wendy Craik and Dr Russell Reichelt

Submission/comments on the Draft Study Plan

Please find attached a submission by TAMP to the Independent Study of the Tasmanian Salmon Industry, as detailed in the Stakeholder Engagement Plan document issued by the Department of Premier and Cabinet in May 2026.

There are no confidentiality requirements with this submission.

Kind regards

Diana Shaw
President, Tasmanian Alliance for Marine Protection Inc (TAMP)

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2 July 2026

Attention: **Dr Wendy Craik AM** and **Dr Russell Reichelt AO**, **Joint Study Leads**

INDEPENDENT STUDY OF THE TASMANIAN SALMON INDUSTRY DRAFT STUDY PLAN V 2.0 MAY 2026 AND STAKEHOLDER ENGAGEMENT PLAN

Submission: by the **Tasmanian Alliance for Marine Protection Inc**

The Tasmanian Alliance for Marine Protection Inc (TAMP) is a statewide group consisting of allied community and professional groups and individuals from around Tasmania. Our one common link is a care for, and a passion to protect our waterways that we see as important to our ways of life past, present and into the future.

Established in 2017 and incorporated in 2020, TAMP's purpose is to:

a) protect Tasmania's pristine coastal marine environment by ensuring its wild fisheries, biodiversity and ecosystems remain sustainable for the benefit of current and future generations;
b) engage in meaningful community discussions about the expansion of industrial fish farming in Tasmanian coastal waters with complete transparency regarding the current and future impact and activities associated with open net fin fish farming;
c) hold the industrial fin fish farming industry to account for past, current and potential environmental damage resulting from its activities, including fin fish farm marine debris, and ensure appropriate penalties and remediation are undertaken;
d) establish the introduction of sound, independent, precautionary scientific evaluation of the impact of fin fish farming operations on our coastal marine environment;
e) work towards the eventual relocation of industrial fin fish farming from coastal waters to deep offshore waters or closed-loop land-based operations;
f) openly support and promote the needs of professional and recreational wild fishers, including the employment, income and tourism opportunities they help generate (*ref Article 4.TAMP Constitution*).

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TAMP and its affiliate members have previously contributed feedback and submissions to Federal and State salmon farming-related consultative processes, including:

- The Living Marine Resources Amendments (2021)
- Legislative Council Inquiry into Fin Fish Farming (2022)
- The BECRC Tasmanian Salmon Symposium (2022)
- The Salmon Industry Plan (2023)
- Meetings held with EPA, NRE, and relevant ministers.

TAMP approaches this 2026 Independent Study of the Tasmanian Salmon Industry with some misgivings. These concerns arise from the:

- lack of government response to community concerns raised in previous inquiries and studies;
- omission of professional engagement already provided by TAMP, its affiliates, and allied stakeholder groups; and
- absence of implementation of the recommendations of the Legislative Council Inquiry (2022) and the Salmon Industry Plan (2023).

The Tasmanian salmon industry is facing increasing community scrutiny and criticism over its operations and impacts. These impacts include, but are not limited to:

1. **Environmental harm**
    - Deteriorating water quality evidenced with blooms of Nutrient Indicator Algae affecting rocky reef and sea grass beds, and marine species
    - Light pollution affecting diurnal activity
    - Plastic pollution
    - Waste disposal
    - Climate impacts (both from and upon the industry);

2. **Wildlife interactions**
    - Threatened species including the Maugean skate, and Red Hand fish
    - Threat and harm to seals, birds and other aquatic life;

3. **Animal welfare**
    - The high disease and mortality rate of intensively farmed salmon;

4. **Economic factors**
    - The premise that the salmon industry with government support is positive for the state's economy and employment, without addressing the negative impacts on local smallholder industry, eco-tourism and social impacts;

5. **Regulation and compliance**
    - Permitting an industry to continue where regulatory controls are incomplete
    - Regulatory controls largely reliant on self-reporting
    - The Regulator is itself under-resourced;

6. **'Sustainability' definition** under Tasmania's Resource Management and Planning System
    - Over reliance upon 'adaptive management' in preference to the precautionary principal and scientific and environmental parameters;

7. **Public health**
    - Questionable claims from industry that salmon aquaculture is to 'feed the world'
    - Questionable claims that eating farmed salmon is 'healthy'
    - Modified and antibiotic-treated product
    - Antibiotic levels in public waterways and wild fish populations
    - Impact on residents from noise and light pollution.

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Feedback to the Draft Study Plan

The timing and scope of this Independent Study appear to reflect a political response to growing community concern about the impacts of fin fish farming in and around Tasmania. The decision to commission yet another study suggests that previous processes have been incomplete or ineffective or simply not acted upon.

TAMP finds the Study Plan to be:

- complex in the number of topics and questions posed
- too broad in the range of subject matter
- lacking an adequate timeframe to complete a complex study
- limited in its consultation plans with community.

TAMP refers the Study to the Tasmanian Independent Science Council (TISC) submission and recommendations (with permission from TISC) to focus on issues that are creating debate and conflict in the community.

TAMP endorses the TISC Plan B: *An Alternative Vision for Aquaculture in Tasmania*
Ref: TISC Submission STAKEHOLDER ENGAGEMENT PLAN (SEP).

TAMP represents 'regional and Coastal communities' and engages as an 'Environmental and Conservation Organisation'.

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KEY RECOMMENDATIONS

- **TAMP requests to be formally included in consultation and enquiry as a representative community and environmental organisation;**
- **TAMP endorses its affiliate members' submissions and is to be recognised in the Study as a representative of its affiliate members from across the State;**
- **TAMP proposes that independent scientists, including but not limited to members of the Tasmanian Independent Science Council (TISC), are considered members of the scientific research community and are consulted; and**
- **TAMP requests to be engaged to provide community-based tours during the industry tour phase of the study.**

TAMP presents this feedback and submission, and trusts that it will strengthen the processes for open and transparent community engagement.

In addition, we include a link to TAMP's **submission to the 2022 Legislative Council Inquiry**. This provides a perspective of TAMP's concerns held at that time, most of which have still not been addressed.

Sincerely
for and on behalf of TAMP Inc

[redacted]

Diana Shaw
President, Tasmanian Alliance for Marine Protection Inc (TAMP)