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To:	Tasmanian Salmon Study Secretariat
Subject:	Submission to the Independent Study of the Tasmanian Salmon Industry
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Submitted to: salmonstudy@tas.gov.au
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1. Introduction

I am a resident of Woodbridge, Tasmania, and I am writing to provide feedback on the Draft Stakeholder Engagement Plan and Study Plan for the Independent Study of the Tasmanian Salmon Industry. I welcome this study as an important opportunity to establish a rigorous, evidence-based assessment of the industry's environmental impacts, and I urge the Study Leads to ensure that environmental protection is placed at the centre of this process.

Tasmania's coastal and freshwater environments are among the most ecologically significant in Australia. They support unique and irreplaceable species, many of which are found nowhere else on Earth. The salmon industry operates directly within these environments and has grown substantially over recent decades. It is my strong view that the regulatory framework governing this industry has not kept pace with that growth, and that environmental harm has been the consequence. This study provides an opportunity to correct that imbalance.

2. Comments on the Scope and Focus of the Study

2.1 Environmental impacts must be the primary focus

The Terms of Reference rightly include environmental impact assessment as a core component of the study. I strongly support a comprehensive and rigorous examination of the following concerns, which are well-documented in scientific literature and previous inquiries:

- Nutrient loading and deoxygenation: Salmon farm waste — uneaten feed and fish faeces — accumulates on the seafloor beneath and around pen sites, creating deoxygenated dead zones. This has been documented most severely in Macquarie Harbour, where overstocking led to documented seafloor dead zones that extended toward the adjacent Wilderness World Heritage Area.

- Threatened species: The Maugean Skate (Zearaja maugeana), found only in Macquarie Harbour, remains critically endangered. Scientific evidence has directly linked reduced dissolved oxygen levels — attributable in part to salmon farming — to its continued decline. The Spotted Handfish, one of Australia's most endangered fish with an estimated population of around 80 individuals, is found in shallow reefs in south-eastern Tasmania also potentially at risk from farm activities.

- Hatchery discharges to freshwater: Atlantic salmon smolt are reared in hatcheries on some of Tasmania's most pristine river systems. In many cases, hatchery waste is discharged with minimal treatment directly back into waterways. The study should

examine the cumulative effects of this on freshwater ecosystems, including macroinvertebrate communities and native fish populations.

- Escaped fish: Atlantic salmon are a non-native species. Escapes from sea cages into Tasmanian waterways represent an ongoing risk to native fish populations through competition, hybridisation, and disease transmission. The study should assess the frequency and scale of escape events and the adequacy of current containment requirements.

- Antibiotic use and contamination: The 2025 mortality event in the D'Entrecasteaux Channel saw large-scale antibiotic administration (including oxytetracycline and florfenicol) to address bacterial disease. Antibiotic residues were subsequently detected in wild fish outside of lease areas. The long-term consequences of antibiotic release into the marine environment — including antimicrobial resistance — require urgent examination.

2.2 The 2025 D'Entrecasteaux Channel mortality event warrants serious examination

The mortality event that unfolded from February to May 2025 in the lower D'Entrecasteaux Channel was, by the EPA's own assessment, unprecedented. Millions of kilograms of dead fish were produced across a compressed period, with visible consequences including:

- Congealed fatty material from deceased salmon washing onto beaches at Verona Sands, Randalls Bay, Roaring Bay, Drip Beach, and beaches on the western side of South Bruny Island;

- The use of antibiotics in open-water sea cages, with subsequent detection of residues in wild fish populations;

- Serious questions about the adequacy of the regulatory response, waste management obligations, and the companies' compliance with EPA directions.

The Terms of Reference specifically direct the study to consider the outcomes of the multi-agency debrief following this event. I urge the Study Leads to treat this not merely as a biosecurity matter but as an environmental incident that exposes fundamental gaps in the regulatory framework — gaps that will only worsen as climate change drives more frequent warm-water events in Tasmanian coastal waters.

2.3 Regulatory adequacy and independence

A central concern I hold — shared by many Tasmanians — is that the regulatory framework has historically been captured by the interests of the industry it is meant to regulate. Key concerns include:

- Environmental monitoring requirements have been set at levels that may understate actual impacts; industry-funded or industry-submitted monitoring data should be independently verified.

- Penalties for non-compliance have historically been insufficient to deter breaches. The study should examine whether the penalty regime constitutes a meaningful deterrent or simply a cost of doing business.

- Expansion decisions have proceeded ahead of — or in the absence of — cumulative

environmental impact assessments. The precautionary principle should be applied where scientific uncertainty exists.

- Transparency has been inadequate. Community members and researchers have faced difficulty accessing environmental monitoring data in a timely and usable form.

3. Comments on the Stakeholder Engagement Plan

I welcome the commitment to broad community engagement and note the following suggestions to strengthen the process:

- Regional community forums should be held in areas directly affected by farming operations — including communities in the Huon Valley, the D'Entrecasteaux Channel area, and on Bruny Island — not only in major urban centres. The impacts of salmon farming are most keenly felt in these places.

- The study should actively seek input from independent scientists, not only those with industry affiliations. As the Terms of Reference note, experts must be independent from research institutions receiving salmon industry funding.

- Data transparency should be a prerequisite for meaningful community engagement. Relevant environmental monitoring data, EPA compliance records, and biomass/stocking figures should be made publicly available in advance of community consultation sessions.

- The option of anonymous submissions — noted in the Terms of Reference — should be clearly communicated to community members who may fear social or economic consequences for speaking out in regional communities where the industry is a major employer.

4. Future Production Models

I support the study's examination of alternative production models, particularly land-based recirculating aquaculture systems (RAS). While I understand the economic arguments for the existing open-water model, the environmental evidence increasingly suggests that inshore sea-cage farming in sensitive enclosed waterways like Macquarie Harbour and the D'Entrecasteaux Channel is incompatible with the protection of those environments.

I ask the Study Leads to examine whether any future expansion of the salmon industry — and potentially the transition of existing operations — should be conditional on adopting production models that do not discharge waste directly into Tasmania's marine and estuarine environments. The technical feasibility and financing of RAS has advanced considerably, and several international jurisdictions are moving in this direction.

5. Conclusion

Tasmania's marine and freshwater environments are a public good. They belong to all Tasmanians — and to future generations — not only to those who profit from their use. I urge the Study Leads to approach this study with the independence, rigour, and genuine community-centredness that this moment demands.

I look forward to engaging further with the study process and ask that this submission be

treated as public information.

Yours sincerely,

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