From:	Tasman Peninsula Marine Protection
To:	Tasmanian Salmon Study Secretariat
Subject:	TPMP submission to Salmon Industry Plan
Date:	Wednesday, 1 July 2026 1:06:19 PM
Attachments:	TPMP submission to Salmon Study .docx TPMP submission to Salmon Study .pdf

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Good Afternoon,

Please find attached the Tasman Peninsula Marine Protection Inc submission to the Independent Study of the Tasmanian Salmon Industry Draft study plan and Stakeholder Engagement Plan.

Kind regards

Tasman Peninsula Marine Protection Inc.

Tasman Peninsula
Marine Protection

A TAMP AFFILIATE

To: Dr. Wendy Craik AM and Dr. Russell Reichelt AO, Joint Study Leads

Date: 1 July, 2026

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

SUBMISSION FROM TASMAN PENINSULA MARINE PROTECTION INC. (TPMP)

TPMP welcome the opportunity to submit to this independent review of Tasmania's Salmon Industry.

TPMP is a community based environmental conservation organisation located on the Tasman Peninsula. We are part of the broader Tasmanian Alliance for Marine Protection Inc. *(TAMP)* and aligned with other state-wide groups who have a similar focus. TPMP formed in 2017 to campaign against the expansion of salmon leases in our surrounding waters and the impact it is having in our region including but not limited to:

- Visual Noise and light pollution
- Plastic debris
- Release of excess bioavailable nutrients contributing to excessive damaging nutrient indicator algal blooms (NIA) at Long Bay, Port Arthur, White Beach, Nubeena and surrounding coastlines.
- Hyper-saline emissions from De-salinisation plants.
- Concern over the use of fresh water from dams and bores for bathing fish against Amoebic Gill Disease. The location of discharge of the bathing water and the animal welfare issues associated with bathing of fish against AGD. The lack of controls over the pollution from desalinisation (RO) plants both on the Well boats and at Tassal's bases (Long Bay and Badger Creek).
- Pollution to the environment from the use of antibiotics.

- Social Impact - community health and well-being. Lack of Social Licence to operate in the Community.

TPMP has previously made submission to:

* Legislative Council Inquiry into Finfish farming (released May 2022). It is noteworthy that over 40 submissions specifically referenced the Tasman Peninsula region to this inquiry.

* The Tasmanian Salmon Industry Plan (released May 2023)

* Appeals to EPA and government to rescind the Licence #55 situate at Long Bay Port Arthur (2023 and 2025). We have held community information meetings at packed halls in Koonya and Eaglehawk Neck to inform the public of the grounds on which we are requesting that the Long Bay Licence be rescinded. We had been advised by EPA that a decision would be made regarding the Long Bay licence by June 30th. On June 30th we were advised by EPA that the decision will now be made mid July.

* Tasmanian parliament e-petition tabled 9/5/2023 (2059 signatories) - requesting government to:

    1. *Immediately produce, and publicly release, an independent, professional cost benefit analysis of the salmon industry for the year 2021/22; and*
    2. *Prior to further expansion of the salmon industry, produce and publicly release, an independent, professional business case to justify the expansion.*

TPMP members have spent countless volunteer hours gathering data on the impacts of the salmonoid industry in our region and submitting to inquiries as demonstrated above. Our efforts seem to have been largely ignored.

TPMP is concerned that community input to previous government initiatives and directives embedded in the MFPRP review May 2018, the extensive recommendations in the Legislative Council Review (May 2022) and the "enduring" Salmon Industry Plan (2023) have not been adequately taken into consideration.
Government's implementation of recommendations outlined in the Salmon Industry Plan have not been acted on, including:

* the transition of flow through fish hatcheries to RAS.
* the Technical standards designed to support the Environmental standards have not been completed.

* community engagement forums promised to be held across the state did not take place leaving communities continuing to demand transparency and having to access Right to Information processes.

Based on these processes we approach this independent Study of the Tasmanian Salmon Industry with a degree of skepticism.

Comments on the Draft Study Plan:

TPMP find the draft Study plan to be complex and attempting to cover too broad a range of subject matter, much of which as mentioned above have been identified in the Salmon Industry Plan yet not acted on.

We recommend the Study focus on the issues generating the greatest debate and community division across the State.

* Pollution of inland waterways and failure to shut down Flo-thru hatcheries

* Use of antibiotics including the recent outbreak of P. Salmonis. There is likely to be more outbreaks of disease which will no doubt have industry demand use of more and potentially different antibiotics. This is completely unacceptable in our public waterways

* Impacts of salmonoid farming on the health of Macquarie Harbour, including the critically endangered Maugean Skate

* The future of salmon farming in shallow, biodiverse and sheltered bays

* To research alternative production systems both on land and truly offshore

* Animal welfare issues

In reference to the Stakeholder Engagement Plan (SEP)

The public/community are the major stakeholders and must be recognised as such. The salmon industry operates in public waters and communities cannot be excluded from Stakeholder Engagement processes. The public bear the greatest risk from poor and inappropriate management and performance by the industry.

We note the Stakeholder Register identifies "regional and coastal communities" as a stakeholder group. **We request that TPMP be formally included and directly contacted as a representative community organisation within that category.** We ask that the learned and lived experience of community members be respected and referred to during the Study's assessment.

TPMP ask that independent scientists including, but not limited to members of the TISC (Tasmanian Independent Science Council) are considered members of the scientific research community and are consulted.

TPMP note the past failure of NRE and the BECRC to address questions raised by the community in their Stakeholder Engagement processes and to adequately represent these concerns in the final Salmon Industry Plan (2023).

The SEP states that feedback on the Draft Study Plan will not be published, but will be considered in finalising the initial Study Plan.

TPMP request that our input is visible and published so that our concerns are not "summarised" in a way that may not reflect our concerns.

TPMP trust you will take our concerns onboard and that our suggestions for improvement in the Draft Study Plan will strengthen the process from a community perspective.

It is vital that the "regional and coastal communities" are engaged openly and transparently in stakeholder meetings. This means engaging not only with the affiliate members of TAMP, but also with the general public via well advertised sessions.
We look forward to providing constructive input to the various phases of the study plan over the forthcoming months.

Submitted by: Tasman Peninsula Marine Protection Inc.



Signed: Terry Brumby - Convenor.
Email: tpmp@tpmp.org.au