From:	Kylie Eastley on behalf of Peter George
To:	Tasmanian Salmon Study Secretariat
Cc:	Peter George
Subject:	Submission - draft stakeholder engagement and study plans - Peter George MP
Date:	Friday, 3 July 2026 8:58:56 AM
Attachments:	Final - submission to Salmon Study Plan - Peter George.pdf

Please find attached the submission from Peter George with feedback on the draft stakeholder engagement and study plans.
I have requested a delivery and read receipt to ensure this submission has been delivered successfully.

All the best

Kylie Eastley *(She/her)* on behalf of Peter George

Senior Advisor to Peter George MP
Independent Member for Franklin
M: [redacted]
Email: [redacted]

PETER GEORGE
YOUR INDEPENDENT FOR FRANKLIN

Peter George
Peter.george@parliament.tas.gov.au
www.petergeorgeforfranklin.com

Friday, 03 July 2026

Salmon Industry Study Leads, Tasmania

Dr Wendy Craik
Dr Russell Reichelt

In preparing my response to the draft Study Plan and Stakeholder Engagement Plan, I reflected on the context of this work and its challenges.

This brief cover note outlines some of the reasons community organisations, independent scientists, individuals and some in the industry are both wary and sceptical of the salmon inquiry.

As a Community Independent, I am guided by what my constituents expect and this informs my response to the draft Study Plan and Stakeholder Engagement Plan.

Tasmania is a unique state in many ways. Its population is relatively small (c.580,000). It is an island defined by waterways and wilderness. A significant number of Tasmanians work in the public service (approximately one third of the total workforce) and there are historically close relationships between political and business decision makers.

Analysis by the Australia Institute shows that trust in government integrity and transparency is low in Tasmania. Official inquiries and public consultations often amount to no more than cover for decisions that have already been made behind closed doors. There is both academic and repeated tangible evidence of this, a prime example being the Gunns papermill saga.

Moreover, when highly credible studies are undertaken, their findings are frequently rejected by the government as mere “matters of opinion”, the most recent examples being TT Lines and the dismissal of independent reports on the Macquarie Point Stadium

This frustrates people who have put considerable energy into engaging in public consultations and undermines their willingness to take part in future processes.

Many individuals, including very qualified experts, are reluctant to speak against powerful interests. This fear is exacerbated by the size of the Tasmanian population, the dominance of government, powerful commercial interests and the lack of alternative professional opportunities on the island for those who do speak out.

Further, the "churn" of individuals moving back and forth between business and government undermines confidence in the way decisions are made. Examples of this include former Salmon Tasmania CEO, Luke Martin who left to become Labor leader Dean Winter's Chief of Staff; current Salmon Tasmania CEO, Dr John Whittington, former secretary of the Dept of Primary Industries and Water, under whom the salmon industry began its rapid expansion, later CEO of Blue Economy CRC, engaged in salmon industry research in Bass Strait.

While no suggestion of wrongdoing is implied, these examples of "churn" are commonplace in Tasmania.

Finally, I wish to flag there is genuine concern that the management of communications and secretarial duties has been delegated to the Department of Premier and Cabinet (DPAC), an issue to which I refer in my response to the planned study (below).

This not only gravely undermines perceptions of independence but acts as a disincentive to those individuals who seek to communicate with the study in confidence. I strongly urge you to distance your study from DPAC or see it fatally undermined.

Please find below my comments and recommendations relating to:

- The proposed approach to stakeholder engagement
- The scope, focus and structure of the study

I understand that the feedback from all submissions will be considered by the Study Leads as the plans are finalised.

I look forward to seeing the final plan and engagement strategy and would welcome the opportunity to continue to meet with the Study Leads throughout the process to help ensure this truly is a comprehensive independent study.

Warm wishes,



Peter George MP

Feedback on the draft Stakeholder Engagement Plan and Study Plan

Engagement Plan feedback

Chapters	
1. Intro and purpose	
2. Guiding Principles	**Independence:** • As the study Leads are mainland-based, they will need insight into the diverse and complex nature of the State and its population. Will independent, on-the-ground research be undertaken to capture community attitudes in the context of the salmon industry?
3. Stakeholder register	• The plan appears to exclude individuals from submitting or appearing before the inquiry (p.6). It is imperative that the study is open to all Tasmanians who wish to contribute if the study is to be accepted as a genuine attempt to inquire into the impact of the salmon industry in Tasmania. • Stakeholders including fishers, local residents, potential whistleblowers, industry workers, tourism and business operators and more should be actively encouraged to contribute to this comprehensive study process. • Respectful and appropriate consultation with Aboriginal people is essential and should be an early priority for the study, including consideration of the cultural rights and heritage of Aboriginal groups and individuals. **Please provide details of how the Study Leads will consult with the Tasmanian Aboriginal people to ensure their values, culture and practices are considered in the recommendations.** **Conflicts of Interest** • Potential conflicts of interest must be disclosed and fully considered for a balanced report, with particular attention paid to scientists (p.6) working for, or on contract to, the salmon industry or whose research and livelihoods are supported by or subject to industry-based research.

	• This is particularly relevant to research that may be subject to commercial-in-confidence restrictions or owned or copyrighted by the industry.
4. Study plan and topics	**International benchmarks** • Reference is made on numerous occasions to "best practice" (pages 6,7,8). "Best practice" is a controversial notion applied in every jurisdiction where the salmon industry is located. • Every nation has different benchmarks and every nation has different marine conditions, for instance Tasmania's waters are warmer and/or shallower than any in Norway, Canada, Scotland and Chile. • Serious care is required where comparisons between jurisdictions are made to ensure the recommendations and outcomes address the specific needs of the State and the community. **Benefits and Costs** • As previously raised with the leads, the repeated use of the term "benefits" rather than the neutral "impacts" is of continuing concern to communities and individuals hoping for a balanced, objective inquiry (p.7). • Similarly, the word "opportunities" is used to describe off-shore or land-based alternatives, which implies this transition would be entirely up to the industry. **Science** • Scant or no reference is made to scientists who are not engaged by the industry or organisations like the CSIRO and IMAS, both of which undertake research for the salmon industry and/or for government organisations engaged in promoting the industry, i.e: FRDC. Potential for conflicts of interest are manifold. • In Tasmania, on the mainland and internationally, there are individuals and organisations with extensive knowledge of the marine environment and the impact of the salmon industry on waterways, fresh and salt. These include scientists - retired or still working at institutions - scientific bodies such as the Tasmanian Independent Science Council (TISC), as well as citizen science, often conducted and reported by individuals and coastal residents using both formal and informal knowledge and observations. Viz: submission by Prof Stewart Frusher (below)

	Salmon Industry (Commercial) • Reference is made to "international salmon farming expertise" (pages 6&7) without reference to international experience of negative impacts, regulatory breaches and compliance failures of the global industry, including the owners of Tassal (Cooke) and Huon (JBS) and Petuna (Sealord). • Indeed, there are parts of the world, such as Washington State, British Columbia, and Beagle Channel, between Argentina and Chile, where salmon farming has been banned because of its indisputably negative impacts on environment and communities. • It is recommended that the leads contact international organisations such as the Global Salmon Farming Resistance which has spent years documenting the global impacts of salmon farming in sensitive areas
5. How to be involved	• Notification of public inquiries in Tasmania are rarely if ever widely advertised or easily found on government websites and are frequently only disseminated broadly by individuals and interested organisations. • Invitations to submit and engage with the study must be fully and widely advertised in legacy and social media with timelines that allow sufficient time for considered responses.
6. Indicative timeline	• Industry study tours are scheduled for 31 July to 30 Nov 2026. This is before the water temperature heats up and will not provide the full picture of the issues faced by salmon farms when temperatures rise, when there are outbreaks of disease and antibiotic use increases. **Recommendation:** Conduct 2 industry study tours, with an additional tour scheduled for late Feb early March 2027. This would provide a comparison between July/Nov to Feb/March. • The timeline is unclear about when individual Tasmanians and other non-industry/government organisations will be able to make submissions (p.12). **Recommendation:** An updated timeline should be provided with clear dates and deadlines for both the internal processes by the reviewing experts and future consultation opportunities.

	• Timeline is out of order, with public release of Phase 1 findings for stakeholders 1 April 2027, but the Drafting of Phase 2 Final Report 1 March 2027. **Recommendation: C**larify the timeframe and time allocated to editing the Report, to include recommendations from stakeholder consultation which closes on 30 April 2027.
7. Reporting and transparency	• Given community concerns about transparency of process, it is vital that information is shared publicly throughout the life of the project. This should include: o Diary of meetings o Links to Studies, reports and research that are being considered by the Study Leads o Other key details relating to the study • To ensure key stakeholders are kept up to date on the process, public briefings should be provided at least once a month for Study Leads to provide an update and take relevant questions. o This would enable members of Parliament to attend and provide updates to their electorates. Especially important to those communities impacted by/or engaged with the salmon industry.
8. Governance and roles	• There was a clear understanding from the start that the inquiry would be entirely independent of the Tasmanian government. • The draft's proposal for a secretariat within the Department of Premier and Cabinet (DPAC) (p.13) was never agreed to, and in fact was explicitly excluded in discussions. • What mechanisms are in place to maintain independence, build trust between stakeholders fearful of exposure, especially when DPAC is the central portal for accepting submissions and enquiries? • How are the Leads engaging with DPAC as the secretariat and support agency for this study? **The independence of the inquiry will be fatally compromised and undermined in public perception by a secretariat located in the heart of government.** • Further, the knowledge that all communications will be handled by, and pass through DPAC, will dissuade many individuals concerned about privacy and anonymity. DPAC is widely viewed as one of the most "political" departments in the Tasmanian government.

	• There is concern in the community that the reviewers don't sufficiently explain how they will be insulated from political pressure. • Frustration is already being expressed by key stakeholders trying to engage with the study through DPAC viz. Tasmanian Independent Science Council (TISC). This threatens to undermine perceptions that the study will be comprehensive and independent. **Recommendation:** Appoint an independent consultant to work with the Study Leads and act as a conduit to key stakeholders, including government agencies, thus creating an 'arms length' approach and strengthening the idea of an independent study. This would build stakeholder confidence, deepen the impact of community consultation and strengthen the study process.
9. Key deliverables	
10. Monitoring and evaluation	

STUDY PLAN Feedback

The Terms of Reference (ToR) objective refers explicitly to an inquiry focused on "consistency with Tasmania's Resource Management and Planning System", the core aim of which is *"to achieve sustainable outcomes for Tasmania's natural and physical resources."*

To be consistent with Tasmania's Resource Management and Planning System, these key principles of this system (listed below) must be the guiding principles of the inquiry and specifically addressed.

- **Inter-generational equity:** Resource use decisions should be made considering the needs of future generations.
- **Conservation of biodiversity:** This requires that we maintain community, species and genetic diversity.
- **Precautionary approach:** Where there is uncertainty about the potential impact upon the environment, decisions should err on the side of caution.
- **Social equity:** Private use or development of resources must consider the wider social costs.
- **Efficiency:** Resources must be used efficiently.
- **Community participation:** The community should be involved in establishing the parameters for the use and development of resources.

These principles are essential and referenced in the Terms of Reference for the Salmon Study. As such, each must be individually addressed and referenced in the inquiry and considered when determining the recommendations.

To ensure this process is truly accessible, it is important to use accessible language and all documentation for public response must include a glossary of terms, with clear descriptions.

Study Plan Feedback

Phase 1A	**Current status overview, especially industry, environment and public health**
Phase 1A/1B	• The proposal to consider "contributions to global and local demand for protein" and "food security" omits consideration of the adverse impacts of the salmon industry, and the industry's role in Australia, on global marine resources including sourcing of fish meal from impoverished nations, soy supplies and krill "harvesting" in the Antarctic. • The input of fishmeal (per kg) from impoverished or developing countries should be weighed against the output of salmon on Australian tables (per kg).
Phase 1A	• There is currently no reference in topics to the broader marine ecosystem. **Recommend:** additional Topic/s as follows: • **Topic:** The direct and indirect impact of the salmon industry on populations of neighbouring wild marine life, including commercial and recreationally caught fish, co-located or in the vicinity salmon farms. e.g. oyster leases, mussels, abalone, crayfish etc. • **Topic:** impact on broader marine ecosystems specifically species not caught for food, but which are essential for a healthy marine ecosystem, including birds, seals, seahorses, dolphins, shark, shell life and shellfish etc.
Lead Experts	• What Tasmanian specific experts will be included in this list? • Important to seek the expertise of regional experts who know the Tasmanian environment.
Sources of evidence	

Topic #4	• Regulation and use of antibiotics including florfenicol. Demonstrated lack of proactive monitoring of residue in other marine life, which prompted the cancellation of approval to use florfenicol in March 2026. Proposal to suspend permit for florfenicol in salmon | Australian Pesticides and Veterinary Medicines Authority
Topic #2 **Page 7**	**Community/Citizen Science** • There is concern in the community that community and citizen science will be treated as secondary evidence. • For example, on p.7 of the Study Plan it is noted that "Data from community-led monitoring groups (e.g., Neighbours of Fish Farming)" will be used "where verifiable". **This qualification is not used in relation to industry self-reporting data and implies that this information is less valid.** • This approach does not align with other Government portfolios or sectors, which adopt international best practice, incorporating 'lived experience' into research, ongoing consultation practices and development of policy as a legitimate and reliable source. **The study should clearly demonstrate adherence to this process by treating such evidence as valid.** **Measurable impacts** • Mention is made of "measurable impacts". • How will the Study Leads document the immeasurable impacts and anecdotal evidence provided? For example, persistent light and noise pollution experienced by those who live in the vicinity of salmon farms which are the subject of consistent concern and reporting but are rarely investigated? **Contemporary Standards** • Reference is made in 4. of contemporary standards. What are these standards? **Expert Sources:** • Freshwater Ecology Specialists are mentioned as a Lead Expert – please provide details of who these are. **Engagement: Waste Management Industry:** • Will this include Taswater? Reports from some marine bodies have indicated the negative impact from the release of human waste on waterways. E.g. oyster industry. **Marine Tourism Interests:**

	• Pennicott Wilderness Tours have publicly raised concerns about the impact of salmon farming to the environment. Will Pennicott and others in the marine tourism sector be proactively contacted for input given the potential impact of salmon farms on the tourist sector?
Topic #3	• Needs to be amended to include marine life. • Health impacts of salmon farming, including public health, ecosystem health, wildlife, marine life and salmon health.
Phase 1B	**Economic and sociocultural costs and benefits**
Topic #5	• Topic 5 asks how industry contributes to the economy. Language throughout the plan is not objective and is framed only as a positive outcome. • There should be equal weight given to what economic opportunities are being displaced or compromised by the presence of salmon farming: e.g. lost tourism, impacts on rock lobster and abalone and other commercial wild fishing stocks and jobs. • What is the commercial loss to the other operators and the national and international market. E.g. recent risk to abalone due to the use of florfenicol. • Also falling property values, loss of amenity – beaches closed or locals choosing not to swim/fish because of unknown health impacts.
Topics #5 & #6	• The draft Study Plan does not address the inherent environmental values of Tasmania's natural capital. • At the very least, there should be specific reference to, and reporting of, the UN System of Environmental Economic Accounting. https://seea.un.org/content/homepage
Phase 2	**Climate change, adaptive management for community, government and industry**
Topic #6	• There appears to be no planned investigation of the salmon industry's impact on Tasmania's "brand" which, in shorthand terms, is "clean, green, sustainable."

	• Topic #6 would seem to be the proper area for this question – including but not limited to, impact on tourism, reputational risk and impact on Tasmania's "100% carbon neutral" claim. **Indigenous groups** • Need to ensure there is early consultation with Aboriginal groups across the State. **Please outline how this consultation will be undertaken?** **NOTE:** • A Draft Marine Environment Management Act is being developed by Craig Garland, MP, highlighting consultation and inclusion of aboriginal leadership in the process. • Consultation on Tasmania's proposed new Aboriginal Heritage Act is highlighting acknowledgement of the importance of coastlines, sea country, rivers and other waterways to Aboriginal culture, recognising them as areas that are of Aboriginal heritage significance. • Note: submissions on the latest draft are due by 6 July 2026. • The proposed amendments in the new Aboriginal Heritage Act create new categories: **Cultural Landscape** This can include: • natural features; • archaeological deposits; • places showing evidence of occupation; • areas with strong cultural association to Tasmanian Aboriginal people. **Potential significance** This dramatically broadens the scope of heritage protection and could potentially extend protection beyond isolated sites to larger connected landscapes, including: • coastlines; • islands; • river systems; • cultural travel routes;

	• sea-country locations The Act extends to: • "Tasmania's coastal waters" and defines areas as including: • "land or water". • This is a significant expansion compared with the older land-focused framework and must be a consideration with any further development of aquaculture that may impact waterways and coastlines.
Topic #7	**Lead Experts:** **Recommend:** • Consult with the Emergency Management team of DPAC, which tracks the potential risk and impact of climate-related disasters in Tasmania. • Marine and waterways has been discussed as part of this. DPAC Emergency management
Topic #8	• The topic fails to address the Federal and State subsidies and other financial incentives that support the salmon industry that are paid for by taxpayers. • This includes but is not limited to, the salaries of scientists, engineering intervention in Macquarie Harbour and trial salmon farms in Bass Strait. • Due diligence is also required when considering Tasmanian government assertions that all compliance costs are paid for by the industry.

Submission by Prof Stewart Frusher, IMAS, to Salmon Industry Study, copied to Peter George and repeated here by permission:

The rational for engagement of the *Scientific and Research Community* stakeholder group is *To access world-leading research from institutions (IMAS, CSIRO, Cawthron Institute) and independent experts in similar roles outside Australia and New Zealand.*

Tasmania has for many decades supported one of the largest concentrations of marine scientists globally across several institutions. It also has many scientists that have recently

either retired or left these institutions, but who have considerable state-based insights as well as national and international recognition. These scientists can provide valuable insights from their experience working within Tasmania and abroad. As such, I would suggest that the membership of the Scientific and Research Community also includes relevant Tasmanian based expertise that is external to those institutions identified in the study plan.

I am a scientist with nearly 50 years of research experience, including over 30 years in Tasmania, in sustainable natural resource use. I have a MSc in Aquaculture and a PhD in Fisheries. I have led many of the research programs at TAFI (forerunner to IMAS), including the Sustainable Fisheries Program, Sustainable Environment Program and Climate Change (impacts on marine resources) Program. My last position was as the inaugural Director of the Centre for Marine Socioecology – a joint collaboration between CSIRO and the University of Tasmania. I was also a creator and then co-developer of the Blue Economy CRC. I am a member of NOAA's Centre for Independent Experts where my role has focused on interpreting the biological outcomes from NOAA's fishery assessment. I have co-written several talking point/opinion pieces in the local paper to help the public understand the science that surrounds the salmon industry. I believe that I have considerable relevant expertise that can benefit the Scientific and Research Community and would welcome being a member of the Community.

Kind regards

Stewart Frusher, retired Professor of Marine Science, University of Tasmania