From: Donald Coventry
To: Tasmanian Salmon Study Secretariat
Subject: Response to draft Study plan
Date: Friday, 3 July 2026 5:01:32 PM
Attachments: Salmon Iquiry Study plan response.docx

Dear Independent Study Team,

Please find attached my submission on the Draft Study Plan for the Independent Study of the Tasmanian Salmon Industry.

Thank you for the opportunity to comment on the proposed scope of the study. I hope the submission is of assistance in strengthening the final Study Plan, particularly in relation to the recognition of fish welfare, adaptive governance and the role of the regulatory framework in responding to foreseeable environmental change.

Thank you for your consideration.

Kind regards,

Donald Hugh Coventry

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Donald Coventry
[redacted]

Submission on the Draft Study Plan

Independent Study of the Tasmanian Salmon Industry

To the Independent Study Leads,

Thank you for the opportunity to comment on the Draft Study Plan for the Independent Study of the Tasmanian Salmon Industry.

This submission addresses the study's scope and completeness. It does not seek to predetermine findings or advocate a particular outcome. Rather, it aims to ensure the study examines all major issues needed for a comprehensive and credible assessment of the industry's future.

Overall, the Draft Study Plan proposes a broad examination of environmental, regulatory, economic and social matters affecting the Tasmanian salmon industry. This work could contribute meaningfully to future policy and public confidence.

However, a significant omission should be addressed before the study proceeds.

Recognition of fish welfare. The Draft Study Plan does not explicitly recognise fish welfare as an area of inquiry. This is a significant gap.

Farmed salmon are animals whose welfare is shaped by environmental conditions, husbandry, disease management, handling, transport, stocking densities and operational decisions. Fish welfare is not solely an environmental or operational issue; it is a recognised scientific, ethical and regulatory discipline that warrants explicit consideration in an independent review.

Recognising fish welfare as a distinct area of inquiry does not require predetermined conclusions. It acknowledges that the welfare of farmed animals is a matter of public interest that should be examined alongside environmental protection, economic performance and regulatory effectiveness.

The study should recognise that climate, environmental conditions, disease, fish welfare and management practices are interconnected components of a single operating system rather than independent issues.

The study should draw upon contemporary government reporting, environmental monitoring and fish welfare science rather than relying solely on historical assumptions about industry performance.

The regulatory framework

The Draft Study Plan proposes to examine the adequacy of the regulatory framework governing the industry. This should include animal welfare legislation.

Tasmania has legislation governing animal welfare. The study should examine how these responsibilities interact with environmental and aquaculture regulation, as well as other statutory obligations applying to salmon farming.

This submission does not suggest investigating alleged breaches. Instead, it recommends assessing whether the existing framework appropriately integrates fish welfare into industry management and remains suitable for future conditions.

Climate change and fish welfare

The Draft Study Plan appropriately recognises the challenges posed by climate change.

However, climate change should not be considered solely as an environmental or commercial issue. Rising water temperatures, marine heatwaves, reduced dissolved oxygen, disease pressures and changing ocean conditions directly affect fish welfare. These factors are interconnected, influencing animal welfare, operations, economic outcomes and regulatory performance.

Fish welfare should therefore be considered throughout the study rather than treated as a secondary issue.

Contemporary fish welfare science

The study should draw on contemporary fish welfare science when considering the industry's future. This includes recognised welfare indicators such as physiological stress, behaviour, health, disease, mortality, handling practices and environmental conditions. The aim is not to advocate predetermined outcomes but to ensure decisions are informed by the best available evidence.

Foreseeability and adaptive governance

A strength of the proposed study is its forward-looking focus. This creates an opportunity to assess whether existing governance and regulatory arrangements remain appropriate under changing environmental conditions. Many pressures affecting the industry, including marine heatwaves and shifting ocean conditions, are increasingly foreseeable. As scientific understanding advances, governance systems should evolve to anticipate risks rather than respond only after impacts occur. The study should therefore examine whether current arrangements support adaptive management, early identification of welfare risks and timely responses to changing conditions. This is a question of good governance: whether regulatory systems remain fit for purpose as knowledge, environmental conditions and community expectations evolve. As environmental conditions become increasingly foreseeable through improved climate science and monitoring, the study should consider how governance and regulatory systems adapt to those known risks. Good management changes as knowledge changes.

Recommendation

The Draft Study Plan should be amended to include fish welfare as an explicit area of inquiry. This is necessary to address a critical gap and ensure a complete, credible and forward-looking assessment of the industry. Specifically, the amended plan should:

1. recognise fish welfare as a core component of the industry's future, reflecting its scientific, ethical and public interest significance;
2. examine how animal welfare legislation operates within and interacts with the broader regulatory framework;
3. assess the relationship between climate change, environmental conditions and fish welfare outcomes;
4. incorporate contemporary fish welfare science to inform analysis and decision-making; and
5. evaluate whether existing governance arrangements adequately anticipate and manage foreseeable welfare risks.

Without these elements, the study will not fully assess the industry's impacts, regulatory effectiveness or long-term sustainability.

Conclusion

The Independent Study presents an opportunity to strengthen public confidence through a comprehensive and integrated approach.

Explicit recognition of fish welfare would improve the study's completeness, strengthen its examination of the regulatory framework and ensure future policy is informed by environmental science, governance principles and contemporary understanding of animal welfare. A future-focused study should evaluate not only current regulatory effectiveness, but the capacity of the regulatory system to learn, adapt and respond as scientific understanding evolves.

Including fish welfare as a recognised area of inquiry does not predetermine conclusions. It ensures that an important dimension of the Tasmanian salmon industry is examined with the same rigour applied to its environmental, economic and regulatory performance.

Author

Donald Hugh Coventry is an executive search consultant, governance adviser and independent researcher based in Tasmania. He has held senior leadership roles across the environmental, natural resource management, arts and community sectors, and has a longstanding interest in governance, environmental policy and climate risk. His current research examines the relationship between environmental change, governance, foreseeability and regulatory decision-making. This submission is made in a personal capacity.