From:	Glenys Oogjes
To:	Tasmanian Salmon Study Secretariat
Subject:	Animals Australia submission to the salmon industry study process
Date:	Saturday, 4 July 2026 6:12:14 PM
Attachments:	image002.png image003.png image004.png image005.png image006.png Independent Study of the Tasmanian Salmon Industry - Animals Australia Submission 4 July 2026.pdf

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Dear Drs Reichelt and Craik,

Please find attached the Animals Australia submission to your Study.

We welcome the opportunity to comment on the Draft Study Plan and Stakeholder Engagement Plan for this Independent Study of the Tasmanian Salmon Industry.

Please contact me if you require further information or clarification of our input.

Kind regards,
Glenys

Glenys Oogjes

CEO
[redacted]

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4 July 2026

Dr Russell Reichelt AO and Dr Wendy Craik AM
Joint Leads
Salmon Industry Independent Study

Via Email: salmonstudy@tas.gov.au

Dear Drs Reichelt and Craik,

Animals Australian submission
to the
Stakeholder engagement plan and study plan of the Salmon Industry Independent Study

Animals Australia is a leading national animal protection organisation, with an extensive and demonstrated history advocating for the welfare of farmed animals, especially those in intensive farming environments, including the salmon aquaculture industry. We welcome the opportunity to comment on the Draft Study Plan and Stakeholder Engagement Plan for the Independent Study of the Tasmanian Salmon Industry.

Animal welfare considerations, ensuring animals under human care are provided with a life worth living, are paramount in any animal use industry. A lack of concern for animal welfare standards has brought the social licence of other animal industries under intense scrutiny, as has been recently typified by public opposition to greyhound racing[1,2] and certain land animal farming practices, such as those involving severe confinement.[3-5] Indeed, recent survey data and additional research shows a preexisting significant lack of confidence in the salmon aquaculture industry, both in Tasmania and globally.[6,7]

As such, Animals Australia is very concerned that animal welfare is omitted as a stand-alone consideration in the Draft Study Plan, and that animal welfare organisations are not considered as key stakeholders in the Stakeholder Engagement Plan. The welfare of animals influenced by the Tasmanian salmon industry, both within the farming system itself and impacted by disruptions to their environment by salmon farms, is a prominent concern that is not adequately addressed by consideration of environmental and fish health impacts alone. This omission will only serve to further isolate the Tasmanian salmon aquaculture industry from contemporary concerns of the general public, and risk adverse welfare outcomes for many millions of sentient animals.

Animal health is important, but only one element of considering whether 'a life is worth living'

Our primary concern with the current study design is that animal welfare, the lived experience of individual fishes, is not identified as a discrete area of inquiry. Topic #3 addresses 'salmon health', alongside 'public health', 'ecosystem health', and 'wildlife

impacts', with 'salmon welfare' completely omitted. The regulatory benchmarking against international contemporaries detailed in Topics #4 and #9 focus on environmental and biosecurity frameworks, with animal welfare not addressed.

The life experiences of an animal, and whether they are experiencing a positive or negative welfare state, can be assessed using the Five Domains Model of Animal Welfare.[8] The Five Domains cover the aspects of nutrition, the physical environment, health, behavioural interactions, and the combination and interplay of these factors resulting in the overall mental state of the animal. As such, while animal health considerations are important, an animal that is in good health can still experience a negative life, or a life not worth living, if the other Domains are not adequately addressed.

Salmon 'health' refers to the absence of disease and the management of disease risk. Salmon 'welfare' refers to the subjective experience of an animal: whether it is suffering, whether its physical and behavioural needs are being met, and whether the conditions in which it is kept are humane. Solely addressing salmon health is not an adequate consideration of the life of the individual animal. A salmon can be disease-free and still experience significant welfare compromise. By way of examples, chronic crowding stress,[9] repeated handling for amoebic gill disease (AGD)[10] treatment, inadequate water quality[9] and inhumane slaughter practices[11] all cause measurable suffering in fishes that are medically 'healthy' as assessed by production metrics. Furthermore, animal health is multifactorial, and a lack of consideration of the other four Domains can exacerbate disease incursion and development, as was experienced at a devastating scale in the 2025 Tasmanian salmon mortality event. While the bacterium *Piscirickettsia salmonis* was implicated, environmental challenges causing warmer waters and reduced water oxygen concentration are thought to have progressed the disease to catastrophic effect.[12] Health cannot be considered in a vacuum; all Five Domains impact the lived experience of each fish.

We ask the Study Leads to treat fish welfare as a stand-alone subject in the study scope, equivalent in weight to environmental and biosecurity considerations. The breadth of knowledge and insight that could be provided by dedicated animal welfare organisations on this matter warrant their inclusion as key stakeholders.

The scientific basis for supporting fish welfare is well established

The scientific consensus on fish sentience and capacity for suffering has developed considerably since Tasmania's *Animal Welfare Act 1993*[13] was enacted.[14] Significant peer reviewed research has confirmed that fish have nociceptors rendering them capable of feeling pain, mount physiological stress responses to painful stimuli, exhibit behavioural indicators consistent with pain and distress, and demonstrate motivational trade-offs consistent with experienced suffering.[15] Put simply, fish are sentient animals, capable of subjective experiences and both positive and negative welfare states.

The Institute for Marine and Antarctic Studies (IMAS) analysis commissioned by the Tasmanian Government in 2024 explicitly acknowledged fish sentience and identified specific welfare gaps in the Tasmanian regulatory framework.[16] The Hardy-Smith et. al. national review funded by the Fisheries Research and Development Corporation in 2023 reached similar conclusions.[17] Both documents are directly relevant to this study and should be included in its evidence base.

To not independently address animal welfare considerations would be to discount this contemporary scientific literature, resulting in a lack of robustness in the study.

The regulatory gap

Tasmania is one of very few salmon-producing jurisdictions in the world without a species-specific welfare standard for farmed salmon.[18] Voluntary guidelines addressing standards of care, such as the RSPCA Certified scheme[19] and the Aquatic Animal Welfare Guidelines endorsed by the Department of Agriculture, Fisheries and Forestry of the Australian Government,[20] have no current uptake; while there has been no apparent industry interest in the latter,[16] Huon Aquaculture had their RSPCA certification withdrawn in 2025.[21]

The study should examine whether the *Animal Welfare Act 1993* is adequate as currently structured to protect farmed fishes, whether the Minister's power to prescribe welfare standards under s.44A has been appropriately exercised, and what a minimum adequate welfare regulatory framework would look like for this industry.

Specific welfare issues requiring examination

In addition to the general gap in welfare regulation, we ask the study to specifically examine:

- *Amoebic gill disease treatment:* AGD is identified as Tasmania's most significant salmon health challenge.[14,16] While the infection itself causes significant disease and suffering in affected fishes,[22] treatment requires repeated freshwater bathing, which is also stressful and associated with adverse welfare outcomes.[16] There are currently no welfare standards governing how AGD treatment must be conducted in Tasmania, despite it being a procedure affecting millions of fish each year.

- *Stocking density and chronic stress:* The scientific literature consistently identifies chronic crowding as a source of ongoing welfare compromise in farmed salmon.[9] Tasmania's Marine Farming Development Plans set density limits for environmental reasons, but not welfare reasons,[23] and those limits are higher than the RSPCA Certified standard. The study should examine whether current density limits are consistent with fish welfare science.

- *Inappropriate genetics:* The breeding of triploid salmon, individuals that are sterile and have a larger body size, raises distinct welfare concerns that are not addressed by any current Tasmanian regulatory instrument. Norway introduced a moratorium on farming of triploid salmon in 2023 due to welfare concerns associated with their physiology and larger body size;[24] these genetic concerns will be mimicked in Australia, where triploid salmon are still farmed.

- *The provision of meaningful enrichment:* While it is acknowledged that there is a dearth of research conducted in this area, promising studies are emerging regarding the benefits of providing environmental enrichment to salmon.[25] Further investigation of the use of enrichment which is beneficial and meaningful to farmed salmon is encouraged; the study should proactively discuss how findings may be instituted as they arise.

- *Slaughter practices*: There is no routine government oversight of slaughter practices in Tasmanian salmon farming. International comparators conduct regular inspections of slaughter facilities. The study should assess whether current practices meet minimum welfare requirements and whether oversight is adequate.

- *The welfare of other species impacted by salmon farming*: The impacts on other animals displaced by salmon farming, such as native aquatic species and animals subject to control procedures to minimise impacts on farms, warrants inclusion in the study. As per the previous discussion, the welfare and subjective experience of these animals must be considered independently to the overall environmental effects of farming practices. The use of seal deterrent devices, or 'crackers', is of particular welfare concern.[26]

- *The 2025 mass mortality event as a welfare event, not only a biosecurity event:* The Terms of Reference ask the study to consider the outcomes of the multiagency debrief following the 2025 mortality event. We ask that this examination include the welfare dimension explicitly: what the fishes experienced, how dying and dead fish were handled, the welfare implications of the response, and what obligations exist under the *Animal Welfare Act 1993* when a mortality event of this scale occurs.

Recommended additional expert engagement

In addition to our general comment regarding the inclusion of animal welfare organisations as key stakeholders, we ask the Study Leads to engage with the following organisations, which have specific expertise in aquatic animal welfare and are not represented in the current stakeholder register:

Aquatic Life Institute is an international organisation focused on systems level change for aquatic animals in the global seafood industry. It works directly with certifiers, retailers, and producers on welfare policy and has developed detailed guidance on operational welfare indicators for farmed fish.[27]

Aquatic Animal Alliance is a coalition of animal welfare organisations coordinated by Aquatic Life Institute, dedicated to improving welfare standards for aquatic animals in food systems. Its members include Compassion in World Farming and other organisations with direct expertise in farmed fish welfare science and policy.[28]

Both organisations can bring international expertise and a comparative perspective that would meaningfully inform the study's benchmarking work on welfare regulation.

Further attention is also drawn to the aforementioned IMAS report, which contains valuable international precedents and comparisons throughout the document.[16]

Conclusion

Animal welfare must be meaningfully addressed as a stand-alone factor in the upcoming study, in order to address the Tasmanian salmon industry holistically and stay contemporary with modern scientific findings addressing the sentience of fishes. Animals Australia asks that the welfare of the animals at the centre of the industry, the fishes themselves, be examined with the same rigour the study brings to environmental and economic questions.

The evidence base exists. The regulatory gap is documented by the Tasmanian Government's own commissioned reports. The 2025 mortality event has brought unprecedented public attention to this industry, which already carries a tenuous social licence. This study is a genuine opportunity to address a long-standing failure to protect sentient animals from preventable suffering. The inclusion of animal welfare organisations as key stakeholders can ensure discussion on this topic is robust and well informed.

We are pleased to provide further information or to meet with the Study Leads for further discussion if requested.

Yours sincerely,



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