From:	Felicity Rea
To:	Tasmanian Salmon Study Secretariat
Subject:	Doctors for the Environment Australia Submission regarding stakeholders and study design
Date:	Sunday, 5 July 2026 11:58:55 AM
Attachments:	Submission from DEA re stakeholders and study design.docx

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

Re: Submission to Salmon Industry Independent Study regarding stakeholders and study design.

Dear Drs Craik and Reichelt,
Please find attached DEA's Submission regarding the stakeholders and the design of this important independent enquiry into the Tasmanian Salmon Industry.

Kind regards,

Dr Felicity Rea FRACGP
On behalf of DEA

5 July 2026
Tasmanian Government
By email: salmonstudy@tas.gov.au

Submission to**: The Tasmanian Salmon Industry Independent Study**

Doctors for the Environment (DEA) welcome the commissioning of this independent report into the Tasmanian Salmon Industry, and the opportunity to provide feedback at this important stage of its development.

Whilst this enquiry appears to be generally comprehensive and well designed, the DEA would like to stress the importance of approaching the issue from the **One Health** perspective, so that all critical linkages between the environment and health are examined and evaluated. DEA also urges the use of the **precautionary principle**, which our EPBC Act identifies as a cornerstone of its policy.

DEA is not intrinsically opposed to farmed salmon. Our concern is that this be done in a manner safe for the environment and human health, that benefits all Tasmanians.

Feedback - The proposed approach to stakeholder engagement

Addressing the issue of stakeholder engagement, DEA strongly urges the inclusion of the **AMA (Australian Medical Association)**, the **DEA** and the **ACDC (Australian Centre for Disease Control) as stakeholders**. Many aspects of human health are involved in the salmon industry issue, the most pressing being that of the risks of antimicrobial/multidrug resistance (AMR/MDR).

DEA has a strong stand on many issues involving the salmon industry, all linked by the OneHealth approach, which shows how human, animal and environmental health are all intimately connected. DEA also emphasizes that the pollution of waterways and ecosystems with antibiotics, is a major driver of global "superbugs" or AMR.

DEA advises the direct involvement of the **ACDC (Australian Centre for Disease Control) and specifically the AURA (Antimicrobial Use and Resistance in Australia) group**. Its report Feb 2026 *(Sixth Australian report on antimicrobial use and resistance in human health*) states that “antimicrobial resistance (AMR) is one of the most urgent public health threats facing Australia and the world. It undermines our ability to treat infections, making routine care riskier and less effective. Continued action is needed to preserve the effectiveness of antimicrobials — a foundation of modern health care.”

Likewise, the **AMA (Australian Medical Association)**, the peak medical body in Australia, has a strong stance on AMR, (*Antimicrobial resistance: The silent global pandemic*) and should be included as a stakeholder.

Feedback -The scope, focus and structure of the study

Scope:

The scope as proposed, is wide ranging, but DEA strongly advises the direct involvement of the **ACDC and specifically the AURA (Antimicrobial Use and Resistance in Australia) group**. Its report Feb 2026 *(Sixth Australian report on antimicrobial use and resistance in human health*) states that "antimicrobial resistance AMR) is one of the most urgent public health threats facing Australia and the world. It undermines our ability to treat infections, making routine care riskier and less effective. Continued action is needed to preserve the effectiveness of antimicrobials — a foundation of modern health care."

AMA, the peak medical body in Australia, which has a strong stance on AMR, (*Antimicrobial resistance: The silent global pandemic*) should be included as a stakeholder.

DEA, as the peak body representing doctors who are concerned about the interconnection of environment with health, should also be consulted.

Public Health Association Australia (PHAA) could also be approached.

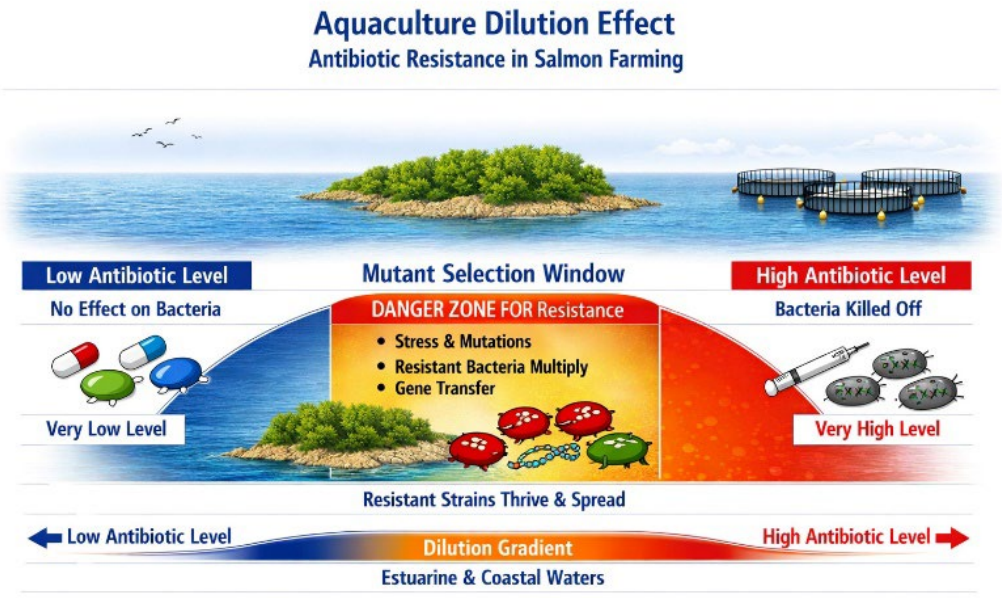
Focus:

The OneHealth approach should be used to guide the study's focus.

Phase 1. Topic #3 recommends the engagement with Public Health Toxicologists for review of antibiotic use in open pen systems. Toxicology is only a small part of the problem. ACDC and the AURA group should be involved as the greatest threat in this area, lies in development of AMR.

EPA is assigned the task of assessing the risks of florfenicol. The major risk with its use, is the development of AMR, which clearly is a health issue and outside the remit of the EPA.

The effects of antibiotic dilution on the development of AMR should be examined. The dilution zones created by use of antibiotics in open waterways create an ideal environment for the development of antimicrobial resistance.



Diluted antibiotics in open waters drive resistance evolution.

As stated previously, this risk is real and one of the most urgent public health threats facing both Australia and the world. Multidrug AMR cannot be undone once it has occurred, with dire consequences for healthcare. This risk analysis should be done by experts in AMR. (AURA, part of ACDC, AMA.)

Phase 1B.

Topic#5. Focuses on the benefits of the salmon industry, whilst Topic#6 focuses on the "social and cultural benefits and costs to the Tasmanian community" To achieve balance, Topic#6 should focus on the risks and costs, both short and long term to Tasmania – not the benefits as this is covered in the previous section.

Structure: The study appears to be generally well designed and comprehensive.

Some changes are recommended.

Inclusion of health experts (ACDC, AURA, AMA, DEA) as stakeholders in assessing risks of antibiotic use in salmon aquaculture.

Topic#5. Focuses on the benefits of the salmon industry, whilst Topic#6 focuses on the "social and cultural benefits and costs to the Tasmanian community" To achieve balance, Topic#6 should focus on the risks and costs, both short and long term to Tasmania – not the benefits, as this is covered in the previous section.

Public reporting of all findings after the completion of each phase is recommended and how this will be communicated should be delineated.

Conclusion.

DEA welcome this study and requests formal representation as a stakeholder, together with AMA Tasmania.

With warming waters globally, an approaching El Nino event, serious consideration about whether this industry can continue in its present form, needs to be given. Use of peer reviewed scientific evidence and the precautionary principle, which as our EPBC Act specifies as a cornerstone, should be used to guide recommendations.