From:	Geoffrey Swan
To:	Tasmanian Salmon Study Secretariat
Cc:	Geoffrey Swan
Subject:	Comment on Draft Study Plan – Independent Study of the Tasmanian Salmon Industry – G. Swan
Date:	Sunday, 5 July 2026 5:50:45 PM
Attachments:	Swan_SalmonStudy_PlanComment_July2026.pdf

Dear Study Secretariat

Please find attached my comment on the Draft Study Plan (May 2026) for the Independent Study of the Tasmanian Salmon Industry, submitted ahead of the 5 July 2026 closing date.

In summary, my comment raises two matters: the underspecification of freshwater hatchery impacts within the Study Plan relative to the mandate set out in the Terms of Reference, and the risk that the current expansion of the Huon Aquaculture Company's Lonnavale facility may proceed to approval before the Study's findings on hatchery discharges and regulatory effectiveness are available. I also request that I be registered as a stakeholder and notified of future submission and engagement opportunities relevant to freshwater hatchery impacts.

I hold a substantial documentary record relating to the Russell River at Lonnavale, spanning eighteen years, which I would welcome the opportunity to provide to the Study at the appropriate stage.

I am happy to be contacted for further information or to discuss any of the above.

Kind regards

Geoffrey Swan

Lonnavale, Tasmania

[redacted]

[redacted]

[redacted]

Independent Study of the Tasmanian Salmon Industry

Comment on the Draft Study Plan (May 2026)

Geoffrey Swan
Lonnavale TAS 7109
geoffreyswan1046@gmail.com
5 July 2026
Submitted in a personal capacity as a resident of Lonnavale and downstream neighbour of the Huon Aquaculture Company hatchery on the Russell River since 2002.

1. Purpose of this comment

I write to provide comment on the Draft Study Plan published in May 2026, ahead of the 5 July 2026 closing date. This comment is not intended to constitute a substantive evidence submission; I understand that written submissions will be called for separately as the Study progresses through its research phases. I hold a body of documentary evidence — spanning eighteen years of direct observation, correspondence, Right to Information disclosures and commissioned scientific reports — that I wish to provide to the Study at the appropriate stage, and I request that I be registered as a stakeholder and notified of all future submission and engagement opportunities.

My comments on the Study Plan itself are focused on two structural concerns: the underspecification of freshwater hatchery impacts relative to the mandate given by the Terms of Reference, and the risk that a major site expansion currently proceeding through a separate regulatory process may pre-empt the Study's findings before those findings can influence regulatory outcomes.

2. Freshwater hatcheries are underspecified in the Study Plan

The Terms of Reference at section 1.1 explicitly require the Study to consider the impact of salmon farming operations on the environment, including the freshwater environment and associated ecosystems. Section 2.0 of the Terms of Reference further requires examination of the impacts of hatchery and farm discharges. These are unambiguous inclusions. The Study Plan should operationalise them with the same specificity it applies to marine farming impacts.

The Draft Study Plan does acknowledge freshwater hatcheries: Topic 2, Question 5 asks how terrestrial and freshwater hatchery operations can impact local river systems and groundwater. This is a useful starting point, but it stands as a single sub-question in a list of five, without dedicated expert sources, without named stakeholder categories specific to freshwater hatchery communities and without tailored engagement modes. By contrast, every other question in Topic 2 is supported by identified lead experts, specific regulatory data sources and targeted stakeholder groups. The practical effect is that freshwater hatchery impacts — which fall squarely within the Terms of Reference — are likely to receive substantially less investigative depth than marine farming impacts.

This gap matters because the regulatory framework governing freshwater hatcheries differs materially from the marine farm equivalent in ways directly relevant to the Study's mandate. The most recent register I hold, an Inland Fisheries Service fish farm licence listing obtained via Right to Information and updated to June 2022, identifies at least seventeen operational freshwater hatchery sites across seven companies, spanning flow-through, recirculating and hybrid systems. I do not have a more current figure and note that this register is itself maintained separately from

EPA's environmental licensing and monitoring framework, under section 196 of the Inland Fisheries Act 1995 rather than EMPCA. This split between IFS fish farm licensing and EPA environmental licensing for the same facilities is a further instance of the regulatory fragmentation this comment raises in relation to the Lonnavale expansion. These freshwater sites discharge nutrient-enriched effluent to inland waterways. Their compliance frameworks are weaker than those applicable to marine farms in several specific respects: monitoring at inland facilities is routinely conducted by operator staff rather than independent parties; community notification requirements for antibiotic use have been absent from the inland framework for at least nine years since comparable marine obligations were established; and mortality event notification conditions have been interpreted in ways that exclude planned culls from their scope. These are regulatory effectiveness questions the Study is directly commissioned to examine.

I also note that obtaining even this basic register required a Right to Information application in 2015, which DPIPWE initially refused on the grounds that the information was otherwise publicly available, before providing the requested data regardless and waiving the application fee. If a facility listing itself required an RTI application to clarify, this speaks directly to the real-time public reporting standards the Study is asked to benchmark against international jurisdictions at Topic 9.

I request that the Study Plan be amended to expand Topic 2, Question 5 — and its equivalent in Topic 4 — into a discrete area of inquiry with identified freshwater ecology experts, named stakeholder categories that include downstream residents affected by freshwater hatcheries and specific engagement modes. The Russell River at Lonnavale provides an eighteen-year documented case study directly relevant to this inquiry, including three commissioned scientific investigations — one by the EPA itself — and a continuous record of correspondence with the EPA, IFS, DPIPWE, HVC and successive Ministers, including a face-to-face meeting with former Premier Will Hodgman and meetings with former EPA Director Wes Ford and Rosalie Woodruff MP. I also made a submission to the 2015 Senate Environment and Communications References Committee inquiry into the Regulation of the Fin-Fish Aquaculture Industry in Tasmania, and to the 2022 Legislative Council inquiry into Fin Fish Farming in Tasmania. I can make this material available to the Study at the appropriate time.

A related question the Study Plan does not yet answer is how sustained community observation of this kind will be weighed against operator-supplied compliance data where the two conflict. The Guiding Principles commit to treating stakeholder input as evidence to be tested against scientific data and the existing regulatory framework. I would ask the Study Panel to state explicitly, for freshwater hatchery sites, how independent verification of operator-reported compliance data will be obtained where no independent auditing mechanism currently exists within the regulatory framework itself.

3. Expansion is proceeding while the Study is underway

Huon Aquaculture Company is currently progressing a major expansion of its Lonnavale facility, a $20 million investment in a new Broodstock Recirculating Aquaculture System (RAS), through an Environmental Impact Statement process under EIS Guidelines issued by EPA Tasmania in September 2024. A letterbox notice sent to “some” neighbouring residents in late June 2026 confirms that the project has received approval to advance to the next stage of assessment, and that a public consultation period will shortly be undertaken by Huon Valley Council. The proposed RAS falls within the scope of the alternative production models that the Terms of Reference at section 3.0 ask the Study to assess.

The same notice confirms that a separate, council-run consultation process is now running alongside the EPA-administered EIS process. This dual-track structure, one process led by EPA Tasmania and one by Huon Valley Council, echoes the original approval of the Lonnavale hatchery

in 2006-07, when HVC permitted the facility's establishment on the basis of existing agricultural land use with no environmental assessment at all. The Study's Terms of Reference at section 2.0 ask it to benchmark the adequacy and coordination of regulatory frameworks; I suggest this two-track local and state approval structure for a single facility is itself a relevant case study of potential regulatory fragmentation.

The Study is the appropriate forum to determine whether flow-through systems that have produced documented, unresolved freshwater eutrophication should continue to operate alongside new RAS facilities, and on what conditions. The Study's own timeline indicates that Phase 1 research on Topics 3 and 4, which encompass hatchery discharge impacts and regulatory benchmarking, runs until October 2026. The approval to advance to the next assessment stage, confirmed in the June 2026 notice, and the imminent council consultation period, mean this is no longer a hypothetical timing risk. It is likely that both the HVC planning process and the EPA EIS process will conclude well before the Study's findings on hatchery discharges and alternative production models are available.

I ask the Study Panel to consider whether its engagement with regulators should include liaison with EPA Tasmania regarding the timing of EIS approvals for facilities whose hatchery operations fall directly within the Study's scope, so that significant regulatory decisions are not made in a manner that pre-empts the Study's findings and recommendations.

4. The case for mandatory decommissioning of flow-through systems

The Draft Study Plan at Topic 8 identifies land-based recirculating aquaculture systems as a future opportunity and area of innovation. The Terms of Reference at section 3.0 ask the Study to assess the technical and financial feasibility of RAS. I suggest the Study should go further, and treat the transition from flow-through to RAS at existing inland facilities not merely as a future opportunity but as a regulatory question requiring a specific finding and recommendation in the context of facilities where downstream environmental harm has been documented and not resolved.

Huon Aquaculture has operated a closed RAS system at its Forest Home facility in Judbury for a number of years with no documented downstream impact equivalent to that observed at Lonnavale. The company is now investing in a second major RAS facility at Lonnavale — at the same site as the flow-through system that has degraded the Russell River since 2007. The technology capable of eliminating the problem is being installed metres from the source of the problem, without any regulatory requirement to decommission the flow-through system as a condition of the expansion approval.

The justification offered for retaining the flow-through system does not withstand scrutiny. Huon Aquaculture's own June 2026 notice to “some” neighbours confirms that once the RAS is operational, the existing flow-through ponds and tanks will no longer be required for fish production, but states that reduced flow will be maintained through the existing channels to provide a water source for the RAS facility and, in the company's words, to “support the wildlife habitats that have developed around the ponds and waterways over many years”. The downstream habitat sustained by that discharge is the eutrophic, algae-dominated ecosystem that has replaced the pristine upland cobble stream existing before 2007. Retaining a pollution source on the grounds that it sustains the ecosystem the pollution created is not an environmental argument; it is a rationalisation for avoiding the cost of decommissioning, now confirmed in the operator's own words. Four successive EPA and IFS Directors have acknowledged in writing that flow-through operation at this site is no longer best practice. The Study should find accordingly and recommend that mandatory decommissioning timeframes be established for flow-through hatcheries where downstream impact has been documented and unresolved across multiple regulatory cycles.

5. Request for stakeholder registration and future engagement

I ask to be formally registered as a stakeholder for all phases of the Study and to be notified directly of written submission opportunities, public hearings, community forums and any expert engagement sessions relevant to freshwater hatchery impacts, regulatory compliance and community amenity. I am available to meet with the Study Panel by videoconference and can provide the full documentary record described in this comment, including the 2017 Premier Hodgman submission and its appendices, the 2018 isNRM Catchment Nutrient Study commissioned by the EPA, RTI-obtained internal EPA and DPIPWE documents and EPA correspondence through to April 2026.

I also note the Study's commitment to provisions for anonymous input to ensure stakeholders can contribute without fear of reprisal. I would ask the Study Panel to be attentive to this issue in the context of freshwater hatchery communities, where employment dependency on the industry in small rural areas has demonstrably suppressed the willingness of witnesses to provide evidence through formal channels.

I welcome the Study's commitment to releasing draft Phase 1 findings for public review before conclusions are finalised. Given the self-reporting concerns raised in this comment, I would ask that findings relating to freshwater hatchery compliance and monitoring be released for public and community comment at that stage with particular care, so that residents with direct, long-term knowledge of specific sites have a genuine opportunity to test those findings before they are settled.

I welcome the Study Panel's commitment to transparency and to producing findings and recommendations, and I look forward to contributing substantive evidence at the appropriate stage.

[redacted]

Geoffrey Swan
Lonnavale Tasmania

[redacted]