From:	John Whittington
To:	Tasmanian Salmon Study Secretariat
Cc:	Healey, Mathew
Subject:	Salmon Tasmania submission — Independent Study draft Study Plan and SEP
Date:	Thursday, 2 July 2026 1:24:38 PM
Attachments:	Outlook-j3nv0jzd.png Salmon Study feedback - CONFIDENTIAL.pdf

Dear Dr Craik,

Thank you for the opportunity to meet on 1 July 2026.

Please find attached Salmon Tasmania's submission on the draft Study Plan and draft Stakeholder Engagement Plan, provided on behalf of our members Huon Aquaculture, Petuna and Tassal. It raises three matters relevant to the study's credibility: competition law and commercial confidentiality; the evidentiary framework and breadth of industry representation; and transparency around process, scope and stakeholder participation.

In accordance with the process set out in the draft Stakeholder Engagement Plan, we note that this submission will be treated as confidential and not published, in whole or in part.

We would welcome the opportunity to discuss any aspect of the submission and look forward to arranging farm tours and site visits in the coming months.

Yours sincerely,

John Whittington

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Dear Dr Wendy Craik AM and Dr Russell Reichelt AO

RE: Feedback on the draft Study Plan and draft Stakeholder Engagement Plan for the Independent Study of the Tasmanian Salmon Industry.

Thank you for the opportunity to meet with Dr Craik on 1 July 2026, for a preliminary discussion about the Independent Study of the Tasmanian Salmon Industry.

As discussed, Salmon Tasmania and its members Huon Aquaculture, Petuna and Tassal, support the objective of improving public understanding of the industry and informing future policy decisions through robust, transparent and evidence-based analysis. We also acknowledge the significant task entrusted to the Study Leads under the Terms of Reference to examine environmental, social, economic, scientific, regulatory and management arrangements associated with the industry.

We welcome the release of both draft documents and appreciate the opportunity to provide feedback at an early stage. We recognise the considerable work undertaken to date and support the intention to establish a transparent process that provides public confidence. Our comments are offered in that spirit and are intended to strengthen the study before it commences.

Having reviewed the draft documents, we believe there are three important areas that require further attention if the study is to maintain stakeholder confidence and deliver findings that are seen as balanced, credible and procedurally fair.

1. Competition law and confidentiality must be resolved before substantive industry engagement

The Stakeholder Engagement Plan acknowledges that the study will receive commercially sensitive information and proposes that the Study Leads make independent assessments regarding confidentiality and disclosure. While this acknowledgement is welcome, it does not sufficiently address the practical realities and legalities facing industry participants.

The study is seeking engagement from commercially competing businesses in a sector with a small number of operators. It is also seeking information relating to operational performance, environmental management, production systems, supply chains, costs, investment decisions and regulatory compliance. Many of these matters involve commercially sensitive information.

Australian competition law places important limitations on communications and information sharing between competitors. The ACCC has been clear that communications, arrangements or concerted practices between competitors can create competition law risks

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where they have the potential to lessen competition or influence independent commercial decision-making.

The small number of operators in the sector compounds this risk. Standard protective measures such as aggregation and de-identification do not reliably prevent disclosure: a competitor can often derive another operator's confidential information from published aggregate figures by simple subtraction. Any confidentiality framework must therefore address the risk of indirect or residual disclosure, and not only the direct release of identified information.

For that reason, industry participants require greater certainty about how the study intends to manage these issues before being asked to engage in substantive information-sharing processes.

We therefore request that the Study Leads:

- Obtain and publish appropriate advice regarding ACCC and competition law considerations associated with participation in the Study
- Clearly articulate what information may be requested, collected, aggregated, anonymised or disclosed for each of the topics
- Establish protocols that prevent the inadvertent sharing of commercially sensitive information between competing businesses
- Clearly identify how confidential information provided by industry, regulators and third parties will be protected
- Publish a confidentiality framework that gives participants confidence their information will not subsequently be released in a form that could cause commercial harm, including under the Right to Information Act 2009. Given the residual disclosure risks noted above, this framework should provide a defined and binding standard of protection rather than relying on case-by-case discretion.

The success of the study will depend upon stakeholders providing candid and comprehensive information. That can only occur if participants have confidence that both competition law obligations and commercial confidentiality risks are being properly managed.

2. The engagement framework must be balanced, evidence-based and truly representative of the industry

The central purpose of the Study, as described in the Stakeholder Engagement Plan, is to develop a trusted and verifiable evidence base. The Stakeholder Engagement Plan states, as a guiding principle, that stakeholder input will be treated as evidence to be tested against scientific data, international benchmarks, the existing regulatory framework and previous inquiries. We support that principle. However, the draft documents do not yet explain how this principle will be applied in practice: how evidence will be assessed, weighted and

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distinguished from opinion, anecdote, allegation or advocacy. This is a significant issue given the highly contested public debate that surrounds salmon farming in Tasmania.

The Terms of Reference and the Study Plan Preface both state the intention to build on evidence from previous inquiries and existing scientific literature, and Phase 1 expressly aims to minimise the degree of contested views. We strongly support that intent. To give it practical effect, we encourage the Study to clearly articulate how it will build upon the substantial body of work already undertaken by independent regulators, research institutions and previous reviews. Considerable scientific, environmental, economic and regulatory analysis has already been completed in relation to the Tasmanian salmon industry. Explaining how this evidence base will inform the Study, identify genuine evidence gaps and avoid unnecessary duplication will strengthen confidence in both the process and the final report.

The engagement framework currently proposes mechanisms such as stakeholder submissions, 'what we have heard' updates, information papers, public updates and an Open Diary process. Without a clear evidentiary framework, there is a risk that untested claims repeatedly raised through consultation channels acquire legitimacy simply through repetition or visibility.

The study should publish a clear methodology explaining:

- How scientific evidence will be assessed against stakeholder views
- How conflicting evidence will be reconciled
- How uncertainty will be characterised
- How public-facing outputs will distinguish verified facts from contested claims
- How misinformation, speculation and unsupported allegations will be managed

Where submissions contain factual assertions that materially influence the Study's analysis, the Study should establish an appropriate process to verify those claims before relying upon them in its conclusions. The Study's credibility will ultimately depend not on the volume of information received, but on the transparency and rigour of how that information is evaluated.

We also encourage the Study to more fully capture the breadth of the industry ecosystem. The Terms of Reference expressly require consideration of indirect economic contribution, regional employment, innovation, scientific capability and supply-chain impacts. The draft Stakeholder Engagement Plan recognises this in part, listing 'other industries' such as equipment suppliers, tourism and commercial fishing, and Study Plan Topic 5 refers to the multiplier effect for local small businesses. However, this category is only thinly specified. Given its direct relevance to the Terms of Reference, we encourage the Study to identify and engage this network explicitly, rather than treating it as a residual category.

The study should actively identify and engage:

- Feed manufacturers

- Waste management companies

- Freight, logistics and transport providers
- Boat builders and marine farming infrastructure manufacturers
- Plastics fabrication and welding businesses
- Aquaculture electrical and engineering specialists
- Diving and marine service contractors
- Environmental consultants and scientific service providers
- Technology companies and innovation partners
- Regional suppliers and maintenance contractors

These businesses collectively represent a significant component of the industry's economic and social footprint and possess expertise directly relevant to the study's objectives, particularly regarding environmental management and sustainability.

A genuinely balanced engagement process must capture not only the views of operators and critics, but also the broader network of Tasmanian businesses whose livelihoods and expertise are linked to the sector.

3. Greater transparency is needed around process, scope and stakeholder participation

The draft Study Plan appropriately recognises that additional issues may emerge as the Study progresses. Some flexibility is both reasonable and necessary in a review of this scale and complexity. However, the process would benefit from greater clarity around how changes to scope, new evidence and stakeholder engagement will be managed as the Study evolves.

Stakeholders should have confidence that the process is transparent, predictable and provides equal opportunity for all participants to contribute. This includes clear consultation milestones, defined submission periods and a transparent approach to introducing new topics or considering significant new evidence.

Without appropriate safeguards, there is a risk that material raised later in the process may not receive the same level of scrutiny or that stakeholders who have already invested considerable time preparing evidence-based submissions may not have a meaningful opportunity to respond to new issues or allegations that arise.

To strengthen confidence in the Study, we recommend that the Study Leads:

- Publish a clear consultation timetable, including key milestones and submission deadlines.
- Establish a transparent process for identifying and communicating any substantive changes to the Study's scope or lines of inquiry.
- Provide stakeholders with an opportunity to respond where significant new evidence or issues emerge after the primary consultation period.

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- Clearly explain how late submissions or additional material received during the Study will be considered and reflected in the final report.
- Publish the methodology that will be used to assess and weigh evidence, including how regulator findings, peer-reviewed research, stakeholder submissions and other sources of information will be evaluated.

These measures would not reduce the Study's ability to consider emerging issues. Rather, they would enhance procedural fairness by ensuring all participants understand the process, have confidence in how evidence will be considered and are afforded a reasonable opportunity to contribute throughout the review.

The issue of media engagement was also discussed during our meeting. We welcome your advice that the Study Leads and members of the Study Expert Advisory Group will make themselves available for media engagement where appropriate. Given the significant public interest in the Study, transparent and accessible communication throughout the process will be important in maintaining public confidence and ensuring the Study's work is accurately understood.

Conclusion

The Independent Study has the potential to make an important contribution to Tasmania's future understanding of salmon farming, the effectiveness of its regulatory framework and opportunities for future investment, innovation and production. Achieving this will require a process that is not only transparent, but demonstrably balanced, evidence-driven and procedurally fair.

We urge the Study Leads to strengthen the study framework by providing greater certainty regarding competition law and confidentiality arrangements, implementing a more rigorous and representative engagement approach, and establishing stronger process controls around scope, timelines and stakeholder participation.

By strengthening these aspects of the framework now, the Study will be better placed to produce findings that are respected by stakeholders across the spectrum, regardless of their individual views on the industry.

We welcome the opportunity to continue to engage with you throughout this process. In particular, we appreciate the opportunity to host you on farm tours and look forward to developing an itinerary for site visits in coming months.

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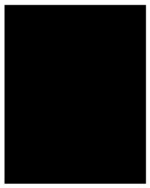
Yours sincerely,



John Whittington

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