From:	Colleen Reardon
To:	Tasmanian Salmon Study Secretariat
Cc:	TCCI EA
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Colleen Reardon
A/Chief Executive Officer
TASMANIAN CHAMBER OF COMMERCE AND INDUSTRY
Industry House, 200 New Town Road, New Town
GPO Box 793, Hobart Tas 7001
t 03 6236 3600 [redacted] **w** www.tcci.com.au



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TCCI Submission on the Draft Stakeholder Engagement Plan and Draft Study Plan
Independent Study of the Tasmanian Salmon Industry

salmonstudy@tas.gov.au

The Tasmanian Chamber of Commerce and Industry (TCCI) provides the following comments on the Draft Stakeholder Engagement Plan and Draft Study Plan for the Independent Study of the Tasmanian Salmon Industry.

TCCI is Tasmania's peak employer and business organisation, representing businesses of all sizes and across all sectors of the Tasmanian economy. Our role is to advocate for policies that support a competitive, productive and sustainable economy and make Tasmania an attractive place to invest, employ and do business.

The salmon industry is one of Tasmania's most significant industries, making a substantial contribution to employment, regional communities, exports, business investment and the State's broader supply chain. Many of TCCI's members operate within, or provide goods and services to, the salmon industry, while many others have a broader interest in ensuring Tasmania maintains a stable, predictable and evidence-based policy and regulatory environment that supports private sector investment.

TCCI also recognises that Tasmania's natural environment is one of the State's greatest competitive advantages and underpins many of the State's key industries.

The Chamber notes that the salmon industry has been subject to significant scrutiny in recent years. This reinforces the importance of ensuring the study is conducted in a manner that is independent, balanced and evidence-based. The Draft Stakeholder Engagement Plan and Draft Study Plan should support informed public policy, minimise unnecessary uncertainty and reinforce confidence in Tasmania as a stable and predictable place to invest and do business.

TCCI Policy Principles

The Chamber's comments are informed by TCCI's Policy Principles, particularly those:

- encouraging private sector investment;
- ensuring regulation is fair, proportionate, transparent and consistently applied;
- providing policy certainty and avoiding unnecessary sovereign risk;
- supporting long-term economic growth and business confidence; and
- ensuring significant public policy decisions are based on robust evidence and objective analysis.

Recognition of TCCI as a key stakeholder

The Draft Stakeholder Engagement Plan proposes broad stakeholder engagement. However, the Chamber notes that Tasmania's peak business organisation is not specifically identified as a stakeholder despite the study considering the industry's economic contribution, regulatory framework, innovation and future opportunities.

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Given the significance of the salmon industry to Tasmania's economy and the broader implications of the study for business confidence and investment, TCCI requests that it be recognised as a key stakeholder and consulted throughout both phases of the study.

In particular, the Chamber requests that it be consulted on:

- Topic 5 – Economic contribution;
- Topic 6 – Social and community impacts;
- Topic 8 – Innovation, research and future production models; and
- Topic 9 – Future regulatory settings and international benchmarking.

As Tasmania's peak employer and business organisation, TCCI can provide valuable insight into the broader business, economic and investment implications of the matters being considered by the study.

Evidence-based engagement and communications

The Draft Stakeholder Engagement Plan recognises that stakeholder input should be tested against scientific evidence, international benchmarking and existing regulatory frameworks before informing findings and recommendations.

TCCI notes the proposal to publish "What We Heard" updates throughout the engagement process. While transparency is important, the Chamber is concerned that interim summaries of stakeholder views may inadvertently be interpreted as evidence or preliminary findings before information has been assessed and verified.

The Chamber encourages the Study Leads to ensure interim communications clearly distinguish stakeholder views from evidence-based findings and provide appropriate context.

TCCI also encourages the Study Leads to consider whether the proposed sequencing and publication of engagement material best supports informed public discussion. Given the significant public interest surrounding the industry, communications throughout the study should reinforce that conclusions will ultimately be based on verified evidence rather than the volume or prominence of competing stakeholder views.

These measures would strengthen confidence in both the engagement process and the independence of the final study.

Study approach, regulatory confidence and investment certainty

TCCI notes that the salmon industry already operates within a comprehensive regulatory framework. The Chamber encourages the Study Plan to clearly communicate that the purpose of the study is to objectively assess the effectiveness of the existing regulatory framework, consistent with the Terms of Reference.

The Chamber encourages the Study Plan to place greater emphasis on improving public understanding of Tasmania's existing regulatory framework, including the respective roles of

regulators, monitoring programs, compliance activities and enforcement mechanisms. This would assist in building public confidence in the regulatory system.

Given the significance of the salmon industry to Tasmania's economy and the level of capital investment within the sector, it is important that the study is conducted efficiently, transparently and with a clear focus on evidence. Prolonged uncertainty can discourage future investment and increase perceptions of sovereign risk, not only within the salmon industry but more broadly across the Tasmanian economy.

Consistent with its Policy Principles, TCCI strongly supports policy settings that provide investment certainty and opposes unnecessary sovereign risk. The Chamber encourages the Study Plan to recognise the importance of conducting the study in a manner that minimises unnecessary uncertainty and reinforces confidence that its conclusions will be based on robust evidence, balanced analysis and objective assessment.

TCCI would appreciate the opportunity to participate in the study as it progresses and contribute to consideration of the economic, regulatory and investment issues identified in the Study Plan.

2 July 2026

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