From:	Rosalie Woodruff
To:	Tasmanian Salmon Study Secretariat
Subject:	Tasmanian Greens Comments -- Draft Salmon Study Plan and Engagement Framework
Date:	Sunday, 5 July 2026 6:13:20 PM
Attachments:	Tasmanian Greens Comments -- Draft Salmon Study Plan and Engagement Framework.docx

Dear Dr Reichelt and Dr Craik,

Please find attached our submission from the Tasmanian Greens to the Draft Study Plan and Engagement Plan.

Kind regards,

Rosalie Woodruff

Dr Rosalie Woodruff MP
Leader of the Tasmanian Greens
Greens Member for Franklin

Thursday, 30 July 2026

Russell Reichelt and Wendy Craik
Co-Leads Salmon Industry Study
via email: salmonstudy@tas.gov.au

Re: Comments on Draft Salmon Study Plan & Engagement Plan

Dear Dr Reichelt and Dr Craik,

This study presents an opportunity for environmentalists, marine scientists, salmon industry workers and local communities to voice their concerns and share their experiences about the operations and impacts of this destructive industry.

However, this has happened before and no meaningful and positive change has resulted. Understandably, the community is burnt out and sceptical. The recommendations of previous reviews, including the comprehensive work of the Legislative Council's *Inquiry into Fin Fish Farming in Tasmania* in 2022, have largely been ignored by industry and by Government. Many much-needed and long overdue reforms have sat unactioned on ministers' desks. Highly qualified scientists have resigned from government assessment panels to protest a lack of independence in the government's regulation of the industry.

The environment is being seriously degraded. This study needs to result in action, and change to protect the environment. Business-as-usual for this industry cannot continue. And the community must not pour their time and energy into another exercise that does not substantially move the dial.

Context

For decades, the farmed salmon industry in Tasmania has wrought untold damage on the marine environment, with all their expansionist plans supported by the Government and the Opposition. Both major parties have sold out the environment and communities, at the same time as they have taken donations from the multinational salmon companies who profit.

Parliament House, Hobart TAS 7000 | Phone: (03) 6212 2260 | rosalie.woodruff@parliament.tas.gov.au

Both the Government and Opposition in Tasmania have weaponised community members against each other, creating a false opposition between regional jobs in one corner, and the marine environment in the other.

Despite this, Tasmanian recreational and commercial fishers, boaters, divers, kayakers, marine scientists, coastal communities, and many salmon farm workers are united in feeling this industry has grown too big, too fast. They observe first-hand the impacts of an environment that has not been able to keep up with this expansion.

As an island state, we are dependent on the health of the marine environment. It provides critical ecosystem services, including food, water and medicine, climate regulation and stabilisation, the sequestration of carbon and processing of oxygen, and critical cultural services that are of fundamental importance to Tasmanian Aboriginal people. Many Tasmanians make their living from the marine environment, or have precious memories of time spent with family and friends on the water. The corporations that have been plundering our marine environment put all of these values at risk, purely in pursuit of profits.

Study objectives

For this study to be successful in its aims, it needs to be entirely objective and neutral.

The objective of the study is:

> To undertake a comprehensive independent study of the Tasmanian salmon industry that considers the effectiveness of regulation and management in achieving sustainable outcomes for Tasmania's natural and physical resources, consistent with Tasmania's Resource Management and Planning System.

The study must be willing and able to make *any* finding that the objective assessment leads to. To be credible, there must be the genuine possibility of finding that the industrial salmon farming industry in Tasmania is *incompatible* with achieving the sustainability of our natural and physical resources.

The draft study plan asks, *What can the salmon industry do better?* This question has an inherent bias. It needs instead to ask to: C*an the salmon industry exist in the Tasmanian marine environment without adverse impacts?*

The objectives of the study is for the salmon industry to be consistent with the Resource Management and Planning System. As per the *Environmental Management and Pollution Control Act 1994,* these are:

(a) to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity; and
(b) to provide for the fair, orderly and sustainable use and development of air, land and water; and
(c) to encourage public involvement in resource management and planning; and
(d) to facilitate economic development in accordance with the objectives set out in paragraphs (a) , (b) and (c) ; and

(e) *to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.*

Clause 1*(a)* says ***sustainable development*** *means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while –*

(a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and
(b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
(c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

Therefore, the key question of the Study needs to be whether or not the industrial salmon industry consistent with these objectives.

We question whether some of the topics intended to be examined in this study are relevant to answering this fundamental question, such as:

- What is Tasmania's competitive advantage in a global salmon industry?
- To what extent does the industry invest in local infrastructure or support community-based economic projects?
- What specific technological or scientific innovations have been developed in Tasmania as a result of the salmon industry, and are these being utilized elsewhere?

Those topics may be of interest to the salmon industry, but the study question isn't whether or not the salmon industry has developed technological or scientific innovations. It is whether the development of those innovations has been sustainable as defined by the objectives of the RMPS – and if not, why not.

Consideration of political influence

Critically missing from the draft Salmon Study Plan is an assessment of what role government policy and political influence have had in enabling the environmental and social impacts of the salmon industry.

That is, the existing regulations have not been sufficient to prevent many adverse impacts on the marine environment to date, so why has this been allowed to happen? Particularly given previous scientific and parliamentary reports have pointed out the regulatory changes needed to prevent further harms occurring, but none or insufficient regulatory responses have been taken.

Some questions that need to be asked to understand this influence include:

- What government policies, positions, and initiatives have enabled the salmon industry to operate without proper oversight and regulation?

- Have institutions such as IMAS and CSIRO been given sufficient government funding to fulfil their mandate of independence, or has research been undertaken in the context of being reliant on support from industry. Has this influenced or compromised their ability to make the recommendations needed to protect the environment?
- Has the EPA filled its role as an independent regulator, or have they been influenced by the government's position, ministerial directives, or resourcing?

This industry operates outside the legislative and regulatory rules of other farming businesses (i.e. it is not governed by the *Land Use and Planning Approvals Act*). It is enabled by the Government, and the industry is a donor to both major parties. The industry is not apolitical, and it is not independent. It is the beneficiary of public resources and public funds.

- The extent to which current and previous governments' policy decisions have facilitated the destructive impacts on the marine environment needs to be assessed.
- Have political donations from the salmon industry to the major parties bought particular outcomes or delayed reforms?

Stakeholder engagement

Community For many years, the voices of concerned community members and independent scientists have been silenced by well-resourced propaganda from multinational salmon corporations and industry-funded research.

It is critical the community is brought along in every stage of the study. We are encouraged to see the Study Leads have planned for public submission periods throughout the study – something the Government did not think necessary in their original proposal.

As we noted in our recent briefing, we are concerned stakeholders should be able to register their interest at any point throughout the study period to stay engaged with the study. We would like to see different phases of consultation advertised further than a website, through newspapers and on community noticeboards, etc, for those who may not be aware of the study at the outset.

Scientists The voices of independent scientists *within Tasmania* must be listened to. The Draft Stakeholder Engagement Plan identifies the scientific community as key stakeholders. It identifies a handful of research institutions, as well as "*independent experts in similar roles outside Australia and New Zealand*".

Independent experts *within* Australia and New Zealand must also be engaged with, particularly marine, freshwater, and aquatic scientists within Tasmania who have had their research, independence and integrity undermined by multinational salmon corporations.

Publication The Draft Stakeholder Engagement Plan notes that "*feedback on the Draft Study Plan* ***will not*** *be published*" (p. 9). It is so important that *all* feedback the study leads receive on the Draft Study Plan is made public, so the community can understand where changes to the final plan have originated.

Please contact me if you would like to understand any of these comments, or for more information.

Kind regards,



Dr Rosalie Woodruff MP
Leader of the Tasmanian Greens
Member for Franklin
[redacted]