From:	Marine Protection Tasmania
To:	Tasmanian Salmon Study Secretariat
Subject:	Marine Protection Submission to study
Date:	Sunday, 5 July 2026 12:43:02 PM
Attachments:	Marine Protection Tasmania Salmon Study Feedback.pdf

Please find attached our feedback to the latest study into this industry
With thanks
MS S Neill

Marine Protection Tasmania respectfully acknowledge all palawa people as the traditional and original custodians of lutruwita the land on which we work and live.

We acknowledge and pay respect to their Elders past, present and emerging and their continuing connection to the skies, land and importantly the waterways.

We care for our environment and it's future in which we all live and share.

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Salmon Industry Study Feedback

General comments

- **The proposed approach to stakeholder engagement**

What community groups are to be involved?
The full list of stakeholders has not been published. Many groups are unaware if they are included; this seems an oversight. The industry is heavily represented on the list, yet the list of the many well-known community stakeholder groups seems to be lacking. TAMP, TPMP, MPT, Friend of North Bruny, NW Tas for Clean Oceans, King Island and Flinders groups, as well as more recent groups such as the Friends of the Bays and The Dodgers Ferry clan.

All of these community groups have rallied over concerns impacting their special place and the marine environment they occupy.

- **The scope, focus, and structure of the study**

The scope and focus seem to have a bias towards industry and those involved or who gain from industry. IMAS is included. These organisations who write their reports have lost valuable community trust as a consequence. Tours of fish farms without independent scrutiny will damage reputational independence. This needs to be addressed. Any fish farm visit should be without notice and with independent observers present.

Topic #2 - Assessment of environmental values, impacts, and benefits of Salmon Farming in Tasmania and lessons from beyond Australia

The expert sources you quote are now lacking independence. IMAS and other organisations benefit from ongoing employment from the industry. They are reliant on this funding. Independent science sources are not included. Other departments at UTAS who have carried out nitrogen studies in marine environments such as chemistry and pharmacy, as well as other scientific organisations, need referencing .

Marine Debris
There is no reference nor questions associated with plastic debris nor microplastic debris caused by the industry. In fact, to date there are no best practice protocols for measuring microplastic contribution from the industry despite community raising this with successive governments. The rest of the world is addressing the microplastic issues, see WHO statement and the ingestion into the food systems but it is being ignored here. See Norway's salmon feed pipe erosion and measures to minimise this.

Nitrogen pollution
The nitrogen impact is underrated and poorly understood. With industry often citing other farmers as the issue rather than addressing the issues themselves. Isotopic nitrogen studies are easily interpreted by chemists and yet the latest data from Long Bay on nitrogen isotopes was cited as not understood.

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Topic #3 Health impacts of salmon farming, including: public health, ecosystem health, wildlife impacts and salmon health.

There are many scientific papers coming out of Chile on the issues with the free use of antibiotics in our public waterways. The EPA has not referenced any in their recent florfenicol data. I draw you to *Florfenicol in aquaculture: environmental fate of residues and dissemination of antimicrobial resistance genes Thangapalam Jawahar Abraham1* and Avishek Bardhan.* There are many recent peer-reviewed papers on AMR in aquatic environments and florfenicol and other antibiotics.
Professor Tim Walsh, who is the chief advisor to the WHO, stated that antibiotic resistance will be one of the top 10 killers of humans by 2050.
He also said all salmon should be vaccinated, and here in Tasmania there is no need to use tonnes of antibiotics to treat diseased fish. Yet here we have their VETs allowed to prescribe tonnes of antibiotics without any long-term sediment testing, flesh testing, or other long-term species testing for AMR. Indeed, the published sediment testing has been with florfenicol as the APVMA requires this. The EPA was let short as industry tried to use this antibiotic without baseline data. This has occurred recently in their hatcheries and in the marine environment.
Will the round table include representatives from designated spokespeople from community groups, the AMA, and independent scientific groups? If not, why not? Representatives from the AMA and the spokesperson from Marine Protection have been calling for action on the use of antibiotics for decades now.

Topic #4: Detailed examination of Tasmania Salmon Industry Regulation and compare with international regulations for compliance and effectiveness – best practice.

There seems to be no reference to the Agvet disease strategy 2019, a plan that Salmon Tasmania and the government were aware of and signed in. If this plan had been followed, the disease outbreaks may not have occurred. Please note this is applicable to Topic *1 as well.

There is no best practice on plastic debris despite many other countries requiring much better accountability; the only improvements have been made after, as one of the vice chairs of the statewide group TAMP raised this with the government ministers at the time. Pieces of plastic are still washing up on beaches, rope floating in waterways posing a risk to the community. They quote the hours they clean beaches, but the debris at the source their leases continues.
One of the questions you ask is stakeholder involvement; we had asked to be part of the debris group formed in the late 2010s, but they refused to directly engage with us.

We object to the fact these companies can use therapeutant antibiotics without proper long-term assessment, adequate notification to public users of our waterways, and they even use it upstream from our water catchment. The Bryn Estyn Estate has had to have a 244 M upgrade to combat issues with the hatcheries being upstream. There are concerns about MND links to green algae as well as the use of many 10s of Kg of oxytetracycline OTC without proper monitoring and notifications. This is not “world’s best practice.

Overall, I am disappointed in this study scope as it seems a repeat of so many enquiries we have had without any change. As Greg Barns, Mercury Newspaper Opinion, Monday 29 June 26, so aptly put it recently in reference to labour but applicable to both so-called major parties, “uncritically supports the salmon industry— which is clearly in need of scrutiny and, at the very least, on the basis it has captured the regulator.”