From:	Jess Coughlan
To:	Tasmanian Salmon Study Secretariat
Subject:	Please see attached submission to the Independent Salmon study 2026
Date:	Sunday, 5 July 2026 8:53:26 PM
Attachments:	image.png Salmon Study submission round 1.pdf

Please find attached Environment Tasmania's Submission to the Independent Salmon Study 2026, round one of the public consultation process.

Jess Coughlan
Senior Campaigner
Environment Tasmania
Monday - Thursday
[redacted]
www.et.org.au I GPO Box 1073, Hobart TAS 7001

We respectfully acknowledge First Nations Tasmanians as the Traditional Owners of the land on which we work and live in lutruwita/Tasmania. We pay our respect to elders, past, present and emerging and admire the ongoing work First Nations do in caring for Country and Sea Country. We acknowledge that sovereignty was never ceded.

ENVIRONMENT
TASMANIA

Recommendations for the Independent Study Plan

Submission due Sunday 5 July 2026

Prepared By Jessica Coughlan
Senior Campaigner
Environment Tasmania
24 Davey St Hobart 7000

Recommendation 1: Publish a full list of stakeholders ahead of the consultation round so that any key stakeholders who are missing can be identified.

Notable absences so far:

- **Tasmanian Independent Science Council - Christine Coughanowr, John Pitt**
- **Australian Medical Association -Tasmanian representative Dr Clare Smith**

Recommendation 2: for subject 1.0: Impact Analysis:

- Natural environment and ecosystems should be identified for their intrinsic value and biodiversity, otherwise it is impossible to accurately gauge the impacts of the industry, beyond the measures that evaluate the capacity for productivity, ie. benthic environment and water column quality.

- Special consideration (an entire topic) should be allocated to Macquarie Harbour and its mismanaged expansion since the 2012 approvals. This is arguably the greatest environmental impact of the salmon industry to date, and sustained operations have resulted in a rapid decline in the endangered Maugean skate population by 42-64%

- Currently, the endangered Maugean skate is only included within the scope of wildlife interactions, which reduces the severity of the negative impacts upon its last remaining habitat through loss of dissolved oxygen, and environment which includes world heritage significance under UNESCO and of which one third is designated Tasmanian Wilderness World Heritage Area.

- The Federal conservation advice should be included as a reference document for the impact analysis. It was created by the scientific peak body, the Threatened Species Scientific Committee and includes decades of research into the harbour, the various influences, and the impacts of salmon farming, which have been listed as a "catastrophic threat" to the survival of this ancient species.https://www.environment.gov.au/biodiversity/threatened/species/pubs/83504-conservation-advice-12022026.pdf

- Recommendation that the study leads request the release of the Storm Bay BEMP review by independent Scottish scientists Kenny Black and Paul Tett from the Scottish Association of Marine Scientists (SAMS) commissioned by the Tasmania

Government. It has never been released - to assess the ability of the BEMP (Broadscale environmental Monitoring Program) to adequately perform its function.

- Similarly, the study leads include the BEMP reviews by SAMS for Macquarie Harbour, Huon River and D'Entrecasteaux Channels in the reference documents.

- Climate change threats should address the globally identified steady increase in annual mortalities worldwide as the industry has considered to have passed its sustainable peak.https://www.nature.com/articles/s41598-024-54033-9
  Related media coverage https://www.nature.com/articles/s41598-024-54033-9

- The study should explore all possibilities for ensuring a sustainable and ethical Tasmanian *aquaculture* industry moving forward, which includes potential for departure away from farming *Salmo Salar,* or Atlantic salmon, as the primary species, and transition out of inshore waterways, inline with the recommendations put forward by the legislative finfish Inquiry report 2022, in particular recommendation 3, which is for a transition in consultation with scientists, industry and community stakeholders to transition industry out of inshore waterways, with priority given to sheltered, sensitive and biodiverse waterways.

- The study should investigate why no expansion of the salmon industry in Tasmania has ever undergone an assessment under our federal nature laws, the EPBC Act, despite industry operating in regions shared with species listed as threatened, endangered or critically endangered under the Act.

- The diversification of aquaculture species and production methods has been identified as necessary for food security, climate, and biodiversity. In particular, studies recommend a shift to bivalves, seaweed, land-based fish, and regenerative aquaculture. An example exists in British Columbia: Discontinued salmon farm leases are being converted to bivalve and seaweed aquaculture leases, as well as the CSIRO's very own Protein Roadmap, and CSIRO Roadmap to reshape Australia's food systems. Recommended studies and information:

- https://www.csiro.au/en/work-with-us/services/consultancy-strategic-advice-services/csiro-futures/agriculture-and-food/australias-protein-roadmap

- https://www.csiro.au/en/news/all/articles/2023/june/food-systems-roadmap

- Wong, A., " Shifting Trends in Aquaculture's Biological Potential to Address Food, Climate and Biodiversity Challenges." *Fish and Fisheries* 27, no. 3: 740–753. https://doi.org/10.1111/faf.70081

- M. Troell, R.L. Does aquaculture add resilience to the global food system?, Proc. Natl. Acad. Sci. U.S.A. 111 (37) 13257-13263, https://doi.org/10.1073/pnas.1404067111 (2014).

- Planet Tracker. 2023. **Avoiding Aquafailure. Aquaculture diversification and regeneration are needed to feed the world.** https://planet-tracker.org/wp-content/uploads/2023/05/Aquafailure-VF.pdf

- Alleway, H. K. et al. 2023. **Global principles for restorative aquaculture to foster aquaculture practices that benefit the environment.** Conservation Science and Practice, 5(8), e12982. https://doi.org/10.1111/csp2.12982
- Boyland, N. & Lara, E. 2024. **Aquaculture must be part of the shift towards regenerative farming.** Regenerative Farming and Sustainable Diets. https://www.taylorfrancis.com/chapters/oa-edit/10.4324/9781032684369-28/aquaculture-must-part-shift-towards-regenerative-farming-natasha-boyland-elena-lara

- Vogliano, C., *et al.* 2024. **Regenerative aquatic foods can be a win–win for human and planetary health.** *Nat Food* **5**, 718–719. https://doi.org/10.1038/s43016-024-01043-5

- **Draft Salmon Aquaculture Transition Plan (British Columbia)** *"Consideration will also be given to how to support technological advances or innovative approaches in other aquaculture sectors such as shellfish, seaweed, hatcheries, and other finfish species."* https://ised-isde.canada.ca/site/ised/en/draft-salmon-aquaculture-transition-plan-british-columbia

- Salmon farm converted to kelp farm example: https://www.veritree.com/post/from-salmon-to-seaweed

- **Hatchery transitions - Norway incentivises moving operations to land based technologies** **https://www.intrafish.com/salmon/salmon-industry-slams-traffic-light-system-overhaul-as-norway-orders-fresh-production-cut/2-1-2008514**
- **Norway has a 25% resource rent tax on salmon farming** **https://www.alanwcook.com/blog/a-simple-primer-on-the-norway-resource-rent-tax**

Recommendation 3:

Review and include the Ocean Equity Index as a potential framework for assessing and improving equity in government policy.

- Blythe, J.L., Claudet, J., Gill, D. *et al.* 2026. The Ocean Equity Index. *Nature* 650, 123–128. https://doi.org/10.1038/s41586-025-09976-y
- OIE Assessment: https://oceanequityindex.org/

Recommendation 4:

1.2 Social Economic and Scientific

- Independent Study leads should be aware of the CSIRO survey released earlier in 2026 https://research.csiro.au/cor/wp-content/uploads/sites/282/2026/03/CSIRO-summary-salmon-aquaculture.pdf

The current prompts call largely for reinforcement of positive bias with regards to salmon industry contribution, without consideration of the social and economic negative impacts to general coastal community wellbeing, amenity to coastal spaces and waterways, direct and indirect impact on tourism and other beneficial coastal economies.

Recommendation 5:

2.0 Regulatory and Management Framework

- The EPA already carried out a contextual analysis of the salmon farming regulations in Tasmania against the operations in other jurisdictions worldwide. **https://epa.tas.gov.au/Documents/Review%20of%20Tasmanian%20and%20International%20Regulatory%20Requirements%20for%20Salmonid%20Aquaculture.pdf**
- The Cawthron review has been carried out to analyse Tasmania's position within the context of the global industry operations **https://epa.tas.gov.au/Documents/RTI%20083%20-%20Cawthron%20review%20of%20EPA%20salmonid%20report.pdf**
- While there have been some improvements in areas such as transparency since the EPA's publication of the above report, the new salmon standards have also been weakened in other areas since the 2023 Salmon Standard, and comparative analysis before and after the introduction of the standard, and the relatively slow uptake of licensing conditions in line with the new standard (where strengthened) should be examined.
- Without adequate baseline monitoring or the state of the Environment Report writer's ability to accurately assess the current state of fresh and marine waterways due to lack of available data, it may be difficult to determine impacts of hatchery and farm discharges. The study should scrutinise why, after recommendation to transition all hatcheries to Recirculating Aquaculture Systems (RAS) by the Legislative Council Independent fin fish Inquiry report were supported by the Tasmanian government, have little to no such improvements away from outdated flowthrough technology been made in the three years since.

Recommendations on the Study Process and Structure

- The Study does not appear to have the opportunity for public hearings, or public opportunities for community meetings with the study leads, however there is a lengthy period or time lasting some months, where study leads will be meeting and engaging with industry representatives and stakeholders.
- The science community who are engaged should be equally represented by scientific communities and individuals who have never accepted funding from industry. IMAS, CSIRO, have both actual and perceived conflicts and these should be declared.
- United States and Iceland should be included in the countries listed for comparisons to Tasmanian regulation, response and penalties.
- The study should seek a report from the Ombudsmen on the relevant Right to Information Requests that are currently under external review by request of the salmon industry companies.

Phases

- The cumulative work of Phase one should be released in a timely manner for public review - not after 12 months. The study plan seeks to base phase 2 on the outcomes of phase one, and therefore phase one should be publicly available before public engagement on phase 2 commences.

Environment Tasmania thanks you for your time and consideration of our submission to the Independent Salmon Study 2026

ENVIRONMENT
TASMANIA