From:	NOFF Tasmania
To:	Tasmanian Salmon Study Secretariat
Subject:	Submission for Draft Study Plan
Date:	Sunday, 5 July 2026 8:52:38 AM
Attachments:	NOFF Submission Draft Study Plan.pdf NOFF Contacts for Wendy and Russell.pdf

Good morning,

Thank you for the opportunity to make comments on the draft study plan.

Please see attached Neighbours of Fish Farming's (NOFF) submission on the draft study and engagement plans. Also attached is a list of NOFF contacts as requested by Wendy and Russell, they are welcome to get in contact with me via phone or email if they have any questions about this.

Kind regards,
Lilly Henley

Lilly Henley
Marine Campaigner
Neighbours of Fish Farming

[redacted]
[redacted]
https://www.noff.au/

I live and work on the unceded lands of the Muwineena people of Nipaluna, Lutruwita. I pay my deepest respects to the Muwineena people, who did not survive colonisation, and to Palawa people of the past, present and future, for holding knowledge and culture strong in Lutruwita.

Attention: Dr Wendy Craik AM and Dr Russell Reichelt AO

As it stands, through choice of language and framings, the draft study plan seems to pre-suppose the salmon farming industry's continued existence in its current form. A truly independent study should assess whether the industry is able to be regulated to operate without harming the environment, other industries and communities. The study ought to evaluate all future options, including industry reduction, relocation, or phase-out altogether, ***not only*** adaptation and growth pathways. Neighbours of Fish Farming (NOFF) and the communities we represent in the D'Entrecasteaux Channel and across Southern Tasmania, ***firmly believe that industrial, open-pen salmon farming must not continue***, and that industry reduction and a transition to more sustainable food production systems should occur, such as land-based *fully* re-circulating aquaculture systems (RAS), or better yet, innovative alternative farming methods like integrated multitrophic aquaculture.

This kind of reduction was suggested by the 2022 Parliamentary Enquiry in recommendation 3; reduce inshore fin fish farming sites, with priority given to ***ceasing operations in sensitive, sheltered and biodiverse areas*****.** The independent legislative council fin fish inquiry published its report in 2022 with 68 recommendations, including this powerful recommendation that a plan in consultation with scientists, government and community should be made to transition out of inshore waterways with priority given to those in sheltered, sensitive and biodiverse areas. No real progress on this has been made since.

Following consecutive summers of mass mortalities and excessive antibiotic use, the salmon industry's social license to operate is at an all time low, a result of its failure to listen to and consider local communities, other industries and our marine and freshwater environments. 70% of Tasmanians are angry or worried about the health of coastal waters, and ***most Tasmanians view the salmon industry as strongly negative*** (Condie and Condie, 2026). Research by the Australia Institute has also consistently found that around 70% of the Tasmanian public supports

moving fish farms out of sensitive, sheltered waters, places like Macquarie Harbour and Long Bay.

Neighbours of Fish Farming would thus like to see the Salmon Industry Study adopt a broader and more genuinely independent approach to assessing the salmon industry and its impacts on Tasmania.

The study should explicitly ***assess impacts on threatened species*** and biodiversity, including species such as the Maugean Skate and Red Handfish, alongside broader ecosystem impacts. It should also consider the full social and economic costs associated with the industry, including impacts on tourism, recreational fishing, ecosystem services, amenity and aesthetic values, the costs of pollution, and the public costs of environmental monitoring, compliance and enforcement. In addition, the study should examine governance and regulatory issues, including ***political influence and lobbying, regulatory capture***, community trust in decision-making, and power imbalances between industry and affected communities.

As currently drafted, the study plan appears to assume the continued operation of salmon farming in its current form. A genuinely independent review should instead examine whether the industry can operate without unacceptable impacts on the environment, communities and other industries. For example, references to identifying "opportunities for adaptation" (Topic 7) and considering "How can the Tasmanian Resource Management and Planning System (RMPS) and EMPCA be updated to better integrate aquaculture" suggest an assumption that existing legislation should be adapted to accommodate the industries continuation in its current form. We ask that the review does not begin from the premise of reshaping legislation around industry continuation, as has occurred previously at both state and federal levels, including in relation to Macquarie Harbour. Rather, the review should consider what ***changes to industry practices, operating methods, or scale of operations*** may be required to ensure that salmon farming does not pollute the environment or adversely affect Tasmanian communities.

Public participation should be genuinely accessible, transparent and equitable. Public submissions should be ***open to all members of the community***, and ***in-person consultation opportunities and public information sessions should be held wherever possible*** to ensure meaningful participation. We also ask for clarification on whether public, in-person engagement opportunities will be provided for community stakeholders. Furthermore,

submission questions and consultation prompts should be neutrally worded to allow for a broad range of perspectives to be captured. The consultation secretarial process should also ensure that submissions are not excluded or discounted simply because they do not directly respond to predetermined prompts.

The consultation process should include ***dedicated opportunities for the community to provide input on impacts to public health and community wellbeing***. This should include consideration of physical and mental health, access to healthy environments, recreational opportunities such as fishing, and impacts on local amenity. NOFF currently has a parliamentary petition open which has been signed by well over 2,500 Tasmanians, calling for tighter restrictions on noise and light pollution, as factory operations on salmon farms adjacent to residential areas currently operate at all hours of the night and early morning.

Finally, information and draft findings from the Phase 1 study topics should be released publicly as they are completed. Releasing all findings only a short period before the final report is due does not provide the community with sufficient time to review the evidence and provide considered feedback.

We also implore you to ***engage multiple Aboriginal groups*** from around the state early in, and throughout, this study, and to spend time on Country with Palawa/Pakana leaders.

Thank you both for undertaking this study and the opportunity to make comments on the draft study plan and draft engagement plan, NOFF looks forward to further engagement throughout the study and helping in any way we can.

Warm regards,
Lilly Henley
Marine Campaigner, Neighbours of Fish Farming

Contacts for Wendy and Russell

Salmon Resistance Community Groups

Tasman Peninsula Marine Protection
Trish Bailey, Terry Brumby
https://tpmp.org.au/

Tasmanian Alliance for Marine Protection
https://www.tamp.org.au/

Friends of the Bays
Steven Saunders, Ian Sale
https://www.friendsofthebays.org.au/

Protect our WaterWays
Jenny Dudgeon
https://www.poww.com.au/

North-West Tas 4 Clean Oceans
Cass Wright
nwtas4clean@gmail.com

Surfrider foundation Tasmania
Drew McPherson
tasmania@surfrider.org.au

Bruny Island Environment Network
James Bunker
https://www.bien.org.au/

Friends of North Bruny
Simon Allston, Alex Matysek
https://friendsofnorthbruny.org.au/

Public Health groups - Antibiotics

Australian Medical Association - Tasmanian Branch
Dr. Clare Smith
https://www.ama.com.au/tas

Doctors for the Environment Australia - Tasmanian Branch
dea_tas@dea.org.au

Science and research
Tasmanian Independent Science Council
Christine Coughanowr
http://www.tassciencecouncil.org/

Aboriginal Groups
Tasmanian Aboriginal Centre
https://tacinc.com.au/

South-East Tasmanian Aboriginal Corporation
Jarrod Edwards
https://www.setac.org.au/