From: [redacted]
To: Tasmanian Salmon Study Secretariat
Subject: Submission by Marcus Higgs
Date: Sunday, 5 July 2026 8:54:32 PM
Attachments: M. Higgs Submission - Tasmanian salmon Industry - 48 Miandetta Drive.docx

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Dear Dr. Reichelt and Dr. Craik,

I attach my submission to your Inquiry.

Kind regards,



Dr. Marcus Hlggs

[redacted]

5 July 2026

Subject: Tasmanian Salmon Industry - Submission on draft Stakeholder Engagement and Study Plan

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Dear Dr Reichelt and Dr Craik,

Whilst not having direct involvement in the Tasmanian salmon Industry, I submit that my knowledge and experience of the forest industry in Tasmania is useful in your considerations as Leaders of this inquiry. I hold a PhD in forest Science and returned to work in Tasmania in 1973, working as a public servant for 40 years before retiring in 2000.

The Tasmanian salmon industry is a resource industry analogous to the forest industry, operating in a region of a small population in which politics is critically important to business success.

The forest industry using timber from public lands, as distinct from private lands, has been highly protected since the 1920s from competition. Few companies held exclusive rights and following the second world war demand for timber led to granting of increases in allocations without serious consideration of the effects on environmental sustainability. When I began work in 1973 District and Regional foresters throughout Tasmania were arguing that the timber allocations, totally 765 000 cu metres of prime quality sawlogs, were unsustainable. But the sawmill Industry vigorously defended its commercial rights. In 1967 the Tasmanian government granted the first exclusive rights concession to export woodchips, helping sawmills to continue operating by clear-felling forest that had previously been selectively logged.

As a result of scientific studies and repeated negotiations with the sawmilling industry, by 1985 the total State allocation of prime hardwood sawlogs was finally reduced from 765 000 cu m /an to 300,000 cu m /an. The State Government agreed to enshrine 300,000 cu. m /an in legislation rather than in the Regulations to made further changes subject to approval by the Parliament rather than the Minister for Forests. Ongoing environmental issues means that the "forest wars" in Tasmania are not fully resolved in 2026.

"Jobs and growth" have been the mantra for the forest industry in Tasmania by the few timber companies and the Tasmanian government, with sustainablility of the natural environment being a secondary consideration to economic benefit, and with the science lagging behind subject to resource constraint. I submit that the Tasmanian Salmon Industry, with its few operators, is being managed in analogous way to the forest industry.

On returning to Tasmania in 1973, the first farmed salmon pens were being established in a corner of Wedge Bay at Nubeena. Research had shown that the cool waters of Tasmania were suitable for framing salmon. Scale of the operation was tiny. Over the subsequent 50 years, rights for salmon farming operations were expanded into North West Bay, the Huon Estuary, the D'Entrecasteaux Channel, Long Bay, Macquarie Harbour, and Okehampton Bay. A small farm established in Apollo Bay Bruny Island was required to be relocated north east of Roberts Point because of community resistance. Various communities are outraged, the science for baseline studies etc is lagging, and the Environment Protection agency is inadequately resources to fulfill it obligations. The horrendous and outrageous fish mortalities in the past two years, and disposal of the morts have stimulated pressure on the State Government to establish the current Inquiry. I should never have got to this point, but its "better late than never".

The Federal and Tasmanian State have been heavily involve in the politics of growth in the salmon industry because of industry arguments about employment. The Prime Minister visited Macquarie Harbour before the last election to assure

worker their jobs are protected despite the science involved the endangered Maugean Skate. No inquiry has been held under the EPBC Act

The Tasmanian Salmon Industry is patently currently operating at unsustainable levels (based on salmon death statistics), without adequate scientific study, just as the forest industry has been operating. The current Terms of Reference document is deficient in this respect. I quote the last sentence of the Background:The study will help inform future policy decisions that seek to balance a sustainable industry with positive outcomes for the Tasmanian environment and community". This specifies "a sustainable industry" and in a secondary way "positive outcomes for the Tasmanian environment and community". The principle of Sustainability should in fact relate to the economic, environment and society.

I accept that your Inquiry will be bound by the Terms of Reference document. Yet I submit it unfortunately is restricting your independence.

Comments and suggestions for the Study Plan

Phase 1A:

Topic #1 Include **Iceland, and USA**. Include policy changes to improve sustainability

Topic #3. Include "Health **and Social** " impacts … and Include" **recreational and local fishing industries**" and include "salmon health **and degree of dependence on anti-biotics**".

Phase 1B:

Topic #6 Include "effect of salmon industry activities" include "amenity, **local shellfish and scalefish industries** and indigenous peoples" …

Phase 2:

Topic #7 Include "carbon management **in micro-climatic zones**".

Suggested changes in the subsequent detailed Questions/Issues

Phase 1A:

Topic #1:

8 What **are Tasmania's competitive advantages, if any**, in a global salmon industry?

Expert Sources

. International Benchmarks: Include **Iceland and USA**

Topic #2:

Questions/Issues

2 Include "upstream, **downstream** or adjacent"…

3 Include "water above it **and areas subject to movement of effluent by marine currents**".

Topic #3:

5 What are the cost impacts on the recreational and local fishing industries for shellfish and scale fish.

Topic #4:

Questions/Issues

1 Include "**Iceland and USA**"

Topic #6

6 **Costs on the recreational and local fishing industries for shellfish and scalefish**.