From: Annette
To: Tasmanian Salmon Study Secretariat
Subject: No salmon in Storm Bay
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I welcome the opportunity to comment on the Draft Study Plan and Stakeholder Engagement Plan (SEP) for the Independent Study of the Tasmanian Salmon Industry. I make this submission as a Tasmanian resident with a longstanding interest in the regulation of the salmon farming industry in this State.

My core concern is that both documents, as drafted, are structured around an assumption that the industry will continue at its current scale or expand, and treat known, serious environmental and animal welfare problems as challenges to be "mitigated" or "adapted to" rather than as evidence that the industry should be scaled back and far more closely monitored. Tasmania has a documented history of regulatory settings that favour industry continuity over precaution. The Study should be structured so it can reach a finding of contraction, relocation, or moratorium if the evidence supports it — not only findings about how to keep the industry growing more sustainably.

1. The Terms of Reference and Study Plan are framed around continuity and growth, not around whether current or expanded scale is appropriate

The Study Plan's own Terms of Reference summary lists "Future Opportunities and Challenges" as one of four core parts of the Study, and Topic #8 directs research toward "offshore farming systems, land-based aquaculture RAS, hybrid systems, circular economy innovations". Every one of the nine research topics is worded as a question about impact, benefit, benchmarking or adaptation — none is worded as a question about whether the industry's current or projected scale exceeds the environmental carrying capacity of Tasmanian coastal waters.

Recommendation: The Study Plan should include an explicit research question testing whether current and/or expanded tonnage in each growing region is compatible with thermal, water-quality and disease-management limits, with reduction, relocation or moratorium considered a legitimate finding — not just mitigation, breeding, or technological adaptation.

2. The Stakeholder Register gives industry named, granular access while community and environmental voices are generic

The Stakeholder Register names specific commercial entities to be engaged — Salmon Tasmania, Tassal, Huon Aquaculture, Petuna — and commits to accessing "international salmon farming expertise". By contrast, "Environmental and conservation organisations" appears as a single unnamed category, with no equivalent commitment to named groups, international environmental expertise, or independent scientific bodies critical of the industry's practices.This asymmetry matters. It mirrors the pattern of privileged industry access that Tasmanians have already seen play out in the regulation of this industry, and it risks the evidence base being built with industry data and framing more thoroughly represented than independent or critical perspectives.

Recommendation: Name specific environmental, conservation, and independent scientific stakeholders in the register with the same specificity given to industry, and commit to engaging international critics of salmon farming practice, not only international salmon farming expertise.

3. Governance sits inside the government department that already owns the industry's growth agenda

Secretariat support for the Study is provided by the Department of Premier and Cabinet — the same arm of government that announced this industry's expansion settings and is politically accountable for "balancing a sustainable industry with positive outcomes", a framing that presumes the industry continues. The SEP states this support is merely "facilitative", but provides no independent mechanism to verify that. Nor does the SEP

publish the Study Leads' own declarations of interest; only Research Partners', the Secretariat's, and government agencies' declarations are mentioned.
Recommendation: Publish the Study Leads' and Expert Advisory Group members' declarations of interest before Phase 1 evidence collection concludes, and specify an independent mechanism (outside the Department) for a stakeholder to challenge Secretariat influence over framing or findings.
4. The health and chemical-use question is too vague given the scale of the problem already on the public record
In 2025, a mass mortality event in southern Tasmanian salmon farms was attributed by the EPA to a summer warming event compounded by the bacterium Piscirickettsia salmonis. In response, an emergency permit was granted for use of florfenicol — an antibiotic not commonly used in Australian aquaculture. Within weeks, approximately 700 kg of florfenicol was released into the D'Entrecasteaux Channel, and residues were subsequently detected up to 10.6 km from the nearest treated lease, in wild-caught rock lobster, abalone, mussels, sea urchins and periwinkles.
Topic #3 of the Study Plan reduces this to a single, generic line: "what are the trends in antibiotic and chemical use… and what are the associated risks to public health and the environment?" This does not commit the Study to independently verifying industry-reported volumes, testing wild seafood for residues, assessing antimicrobial resistance risk, or reviewing the process by which emergency permits such as the florfenicol approval are granted.
Recommendation: Add explicit sub-questions requiring: (a) independently verified (non-industry-sourced) cumulative antibiotic and chemical volumes by operator and by year; (b) testing of wild-caught seafood in waters adjacent to leases for chemical residues; (c) assessment of antimicrobial resistance risk; and (d) public reporting of the criteria and evidence used to justify emergency chemical-use permits.
5. Thermal tolerance is treated as an engineering problem to adapt around, not as a reason to reconsider siting or scale
Atlantic salmon are a cold-water species poorly suited to Tasmania's warming coastal waters, which already sit outside comfortable thermal range for extended periods each year in key growing regions — the same thermal stress implicated in the 2025 mortality event. Topic #7 asks about projected temperature trends, selective breeding for thermal tolerance, and "feasible opportunities for the industry to mitigate" — all framed as adaptation, none framed as a test of whether continued or expanded marine-cage farming in these locations remains a responsible use of public waters as warming continues.
Recommendation: Add a research question requiring the Study to state, for each growing region, the tonnage of production that can be sustained within safe thermal and dissolved-oxygen limits over 5–10 year horizons, and what reduction or relocation would be required to remain within those limits — rather than treating breeding and technology as the only responses to be assessed.
6. Transparency commitments are retrospective record-keeping, not independent monitoring
The SEP's transparency measures — the "Open Diary", public updates, and information papers — record that meetings occurred; they are not a commitment to real-time, independent environmental monitoring of the industry itself. Topic #4 only asks how "effective" current monitoring protocols are; it does not commit the Study to recommending a specific, independently funded monitoring regime as a deliverable.
Recommendation: The Study should be required to recommend a mandatory, independently funded (not industry-funded) real-time monitoring regime for water quality, benthic health and chemical residues as a named deliverable of Phase 1, not merely an assessment of existing protocols.
7. The consultation window on the Draft Study Plan itself is too short
The comment period on the Draft Study Plan closes at 11:59pm on Sunday 5 July 2026. Given the scale, complexity and public significance of this Study, and the technical detail

required to respond meaningfully to nine research topics across environmental science, veterinary medicine, regulatory law and economics, this window is inadequate for genuine public engagement.

Recommendation: Extend the comment period on the Draft Study Plan by a minimum of four weeks.

Conclusion

Tasmania's regulatory history with this industry has repeatedly favoured commercial continuity over precaution, even where the environmental and animal welfare evidence — most recently the 2025 mass mortality event and subsequent florfenicol contamination of wild fisheries — has pointed toward the need for a smaller, more tightly monitored industry. I ask that the Study Leads amend the Study Plan and SEP so that scaling back production, relocating away from thermally marginal sites, and materially strengthening independent monitoring are treated as live, creditable findings the Study can reach — not outcomes foreclosed by a framework that only asks how the industry can keep growing.

Regards

Annette Fuller