From: [redacted]
To: Tasmanian Salmon Study Secretariat
Subject: Submission - Salmon Study
Date: Sunday, 5 July 2026 7:16:24 PM

To whom it may concern,

I support the current Tasmanian regulatory framework as the appropriate foundation for managing salmon aquaculture while the Independent Study completes its evidence-based review. As a Marine Biologist with 40 years international and local experience in commercial aquaculture, clearly Tasmania's 2023 Environmental Standards set a *world-leading monitoring and environmental management framework* for marine finfish farming, explicitly requiring baseline environmental assessments, broadscale monitoring programs and technical metrics such as **Total Permissible Dissolved Nitrogen Output (TPDNO)** that link directly to licence triggers. This makes the regime unusually prescriptive for a single commodity when compared to all other meat farming in Australia**.** As your study plan acknowledges "In 20 years, the industry has increased from 14,500 tonnes in 2003-04 to 86,800 tonnes in 2022-23." and because aquaculture operates in a shared, public marine environment unprecedented levels of environmental monitoring are already undertaken with at least six peer reviewed studies on near field and far field effects completed in the last 15 years. The existing regulatory framework is informed by this and other work and already delivers transparent, evidence-based assessment and adaptive management that shape industry development and underpin environmental performance.

- **Edgar et al. (2011)** — Application of biotic and abiotic indicators for detecting benthic impacts of marine salmonid farming (Tasmania)., Aquaculture - **Finds measurable near-field benthic change but indicates impacts are spatially constrained and can recover under fallowing/management.**

- **Keeley et al. (2012)** — Validation of biotic indices across benthic enrichment gradients., Ecological Indicators - **Validates benthic indices showing enrichment gradients; indices support management-led recovery when deposition ceases.**

- **Lyle (2021)** — Ecological implications of large-scale escape events. IMAS/peer output - **Escape-event analyses show ecological effects that are local and manageable with containment and mitigation measures.**

- **Coutts et al. (2024)** — Comparing visual and molecular methods for aquaculture-enriched sediments., Marine Pollution Bulletin - **Method comparison indicates monitoring can reliably detect impacts early, enabling reversible management actions.**

- **Ross et al. (2025 IMAS guide)** — Guide to Environmental Monitoring and Assessment for Finfish Aquaculture (IMAS outputs). IMAS report / supporting peer outputs - **Monitoring design guidance demonstrates that targeted programs (BEA/BEMP) enable detection and management that supports recovery.**

- **Vopel et al. (2026)** — Environmental impact of exposed salmon farms: transect reveals matching gradients in seafloor ecosystem structural and functional proxies., Aquaculture Environment Interactions - **Shows O_2-demand gradients within ~500 m of pens; gradients are measurable and provide triggers for management actions that can reverse local effects.**

I would welcome the opportunity to expand on the above if required.

Thank you for the opportunity to comment on the study.

David Whyte