From:	Rani Hallums
To:	Tasmanian Salmon Study Secretariat
Subject:	Submission on the Draft Stakeholder Engagement Plan and Draft Study Plan
Date:	Sunday, 5 July 2026 9:41:08 PM
Attachments:	Rani Hallums – Submission on the Draft Stakeholder Engagement Plan and Draft Study Plan – Independent Study of the Tasmanian Salmon Industry.docx

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Dear Dr Craik, Dr Reichelt and the Independent Study Team,

Please find attached my submission in response to the Draft Stakeholder Engagement Plan and Draft Study Plan for the Independent Study of the Tasmanian Salmon Industry.

My submission focuses on the proposed design of the inquiry itself, with particular attention to the role of guiding principles, transparency, multiple forms of evidence and ongoing public participation in supporting an independent and trusted process. It also includes an appendix containing a number of suggested enhancements to the Draft Study Plan for your consideration.

Thank you for the opportunity to contribute to this important stage of the study. I appreciate the openness of the consultation process and look forward to following the inquiry as it progresses.

I understand that submissions will be treated as public information unless otherwise requested. I am happy for my submission to be published with my name.

Thank you for your consideration.

Kind regards,

Rani Hallums

Submission on the Draft Stakeholder Engagement Plan & Draft Study Plan

The Role of Guiding Principles in an Independent Inquiry

Independent Study of the Tasmanian Salmon Industry

Thank you for the opportunity to provide feedback on the Draft Stakeholder Engagement Plan and Draft Study Plan for the Independent Study of the Tasmanian Salmon Industry.

I welcome the decision to undertake an independent review of the Tasmanian salmon industry. Given the complexity of the issues involved and the diversity of views held across the Tasmanian community, an independent process presents an important opportunity to build public confidence through transparency, careful inquiry and respectful engagement.

For the purposes of this submission, my comments are not intended to advocate either for or against the salmon industry. Rather, they respond to the opportunity to comment on the proposed scope, methodology and stakeholder engagement process for the Independent Study. It is my hope that the study provides a robust framework through which evidence, values and diverse forms of knowledge can be considered with rigour and openness.

An independent inquiry is defined not only by the independence of those who lead it, but also by the transparency of the principles that guide it, the breadth of evidence it considers, and the openness of the process through which its conclusions are reached. The purpose of an independent inquiry is not simply to gather evidence, but to establish a process through which evidence can be understood, tested and applied in a manner that is transparent, principled and worthy of public confidence. It is these foundations that ultimately determine whether an inquiry earns public confidence.

Guiding Principles

Evidence alone rarely determines public policy. Decisions are also shaped by the principles and values through which evidence is interpreted.

For this reason, transparency requires not only that evidence be made public, but also that the principles through which that evidence will be interpreted are made explicit. These principles might include integrity, stewardship, humility, transparency, precaution and intergenerational responsibility.

Questions of stewardship, responsibility to future generations, acceptable environmental risk, transparency and the balance between economic benefit and ecological integrity are, at their heart, questions of values. These are not separate

from evidence; rather, they provide the framework through which evidence acquires meaning.

I therefore encourage the Study Leads to articulate the guiding principles that will underpin the inquiry from the outset. Every inquiry rests upon assumptions about what matters, what constitutes evidence, how uncertainty should be approached and what responsibilities are owed to present and future generations. Whether acknowledged or not, these assumptions shape every subsequent stage of the inquiry.

Making these principles explicit would strengthen transparency and accountability. It would provide a clear framework for decision-making and enable participants to understand not only the evidence that is gathered, but also the principles through which that evidence is interpreted.

By clearly stating these guiding principles at the outset, the Study Leads can establish a transparent foundation upon which the scope, methodology and eventual recommendations can be understood, evaluated and trusted.

Framing the Inquiry

Every inquiry is shaped not only by its evidence, but by the questions it chooses to ask. For this reason, I encourage the Study Leads to clearly articulate the overarching question the inquiry seeks to answer.

A clearly stated central question provides coherence across the study's diverse topics, assists participants in understanding how evidence contributes to the inquiry's ultimate purpose, and enables the public to assess whether the study's conclusions logically follow from the questions it set out to explore.

Without a clearly articulated central question, there is a risk that individual topics become disconnected, making it more difficult to understand how evidence gathered across the inquiry contributes to its overall findings.

The questions we ask determine the evidence we seek, the evidence we seek shapes the conclusions we reach, and the conclusions we reach ultimately shape the future we create.

Transparency Throughout the Inquiry

The Draft Study Plan outlines a staged approach to the inquiry. I encourage the Study Leads to clearly articulate how and when the community will have opportunities to participate as the study progresses.

If transparency is to be one of the guiding principles of the inquiry, it should extend beyond the publication of the final report.

Given the complexity of the issues under consideration, it would strengthen both transparency and public confidence if stakeholders were able to respond not only to

the study's scope, but also to evidence as it is assembled and to emerging findings throughout each stage of the inquiry.

Publishing findings progressively as each topic is completed, rather than only through a final report, would allow evidence to be tested, clarified and strengthened before conclusions are reached.

An iterative consultation process would allow participants to engage thoughtfully with the evolving evidence base and contribute constructively as the inquiry develops. It would also demonstrate that public participation is an ongoing element of the study rather than a single point of consultation.

To further strengthen transparency, I encourage the Study Leads to consider publishing submissions (subject to privacy and consent), or at a minimum publishing a summary of the key themes raised during consultation together with an explanation of how those themes informed revisions to the Study Plan and the inquiry as it progresses.

Considering Multiple Forms of Evidence

Once the guiding principles of the study have been made explicit, consideration can then be given to the forms of evidence required to fulfil those principles.

The Draft Study Plan appropriately identifies environmental, economic, social and cultural considerations. I encourage the Study Leads to make explicit that evidence exists in multiple forms and that a comprehensive understanding of complex environmental issues requires more than quantitative measurement alone.

Scientific monitoring, ecological assessment and economic analysis are indispensable. However, many environmental changes are first recognised through long-term observation, lived experience, cultural knowledge and sustained relationships with place. While these forms of knowledge should not replace scientific evidence, neither should they be excluded simply because they are more difficult to quantify.

If one of the study's guiding principles is to consider diverse forms of evidence, then that diversity should also be reflected in the selection of those invited to contribute expert knowledge.

The Draft Study Plan identifies a range of disciplines and expert institutions that will contribute to the inquiry. I encourage the Study Leads to ensure that the selection of experts also reflects a diversity of independent perspectives, recognising that valuable expertise exists both within and beyond major research institutions. This includes independent researchers, practitioners, community-based experts and long-term knowledge holders whose work and experience may offer important insights that complement institutional research.

The Draft Study Plan acknowledges the importance of Indigenous peoples' knowledge and perspectives, particularly in relation to land and Sea Country. I welcome this inclusion.

I encourage the Study Leads to consider whether Indigenous knowledge holders might also be recognised as contributors to the study's expert evidence base, rather than solely as stakeholders for consultation. Aboriginal knowledge systems represent sophisticated, place-based understandings developed over many generations. Their contribution extends beyond community perspectives to include unique ways of understanding ecological relationships, environmental change and long-term stewardship.

Recognising Indigenous knowledge holders as contributors to the study's expert evidence base would reinforce the study's commitment to considering multiple forms of evidence and strengthen its capacity to understand Tasmania's coastal and marine environments through complementary knowledge systems.

Ultimately, the principles that guide an inquiry shape the evidence it seeks, the questions it asks and the conclusions it is able to reach. A study of this significance presents an opportunity to acknowledge that different ways of knowing can strengthen, rather than weaken, our collective understanding.

Examining the Assumptions Behind Regulation

The study's guiding principles should also inform its examination of the current regulatory framework.

Environmental regulation necessarily involves determining what level of impact is considered acceptable. This raises important questions that extend beyond compliance alone.

The study could therefore usefully explore how guiding principles influence regulatory decision-making, including:

- How is acceptable environmental harm defined?
- How are cumulative impacts understood when individual activities may each remain within regulatory thresholds?
- How are uncertainty and precaution balanced when evidence is evolving?
- How are ethical responsibilities to future generations considered alongside present-day economic and social outcomes?

These questions are relevant not only to the salmon industry but to environmental governance more broadly.

Community Engagement

If transparency and respect for diverse knowledge systems are among the study's guiding principles, then the engagement process should reflect those commitments.

I commend the emphasis placed on stakeholder engagement throughout the Draft Engagement Plan.

I encourage the Study Leads to ensure that participation extends beyond formal submissions and representative organisations to include people whose understanding arises through long-term relationships with Tasmania's waterways, coastal environments and communities.

Fishers, divers, tourism operators, recreational users, scientists, artists, educators and local residents all experience these places differently and contribute valuable perspectives that may not always be captured through technical reporting alone.

I also encourage the Study Leads to continue working with Tasmanian Aboriginal communities in ways that respect their knowledge systems, cultural authority and preferred methods of engagement. In doing so, there is an opportunity to recognise Aboriginal knowledge not simply as a stakeholder perspective, but as an enduring system of ecological understanding and stewardship that can contribute meaningfully to the inquiry's evidence base.

Where future consultation invites public submissions, I encourage the Study Leads to ensure that consultation questions remain neutrally framed so that participants are equally able to contribute observations relating to benefits, costs, uncertainties and alternative perspectives. Neutral questions are essential to maintaining confidence in an independent inquiry.

Learning from International Experience

The proposed comparison with international salmon-producing regions offers an important opportunity for learning.

I encourage the Study Leads to consider not only technological innovation and regulatory settings, but also differences in governance, transparency, public access to environmental information, community participation, approaches to managing uncertainty, and the principles that underpin decision-making in those jurisdictions.

Comparisons that explore how trust is built between governments, industries and communities may ultimately prove as valuable as comparisons of production systems themselves.

An effective benchmark is not simply one that identifies what other jurisdictions do, but one that seeks to understand why different approaches have evolved, what principles underpin them, and what lessons may be transferable to Tasmania's unique environmental, cultural and social context.

An Opportunity Beyond Salmon

Although this study concerns a single industry, it also presents an opportunity to strengthen Tasmania's broader approach to environmental governance.

An inquiry of this significance should not be understood simply as a process that gathers information before presenting a final conclusion. Rather, it offers an opportunity for collective learning as evidence is assembled, tested and refined over time. Creating opportunities for ongoing dialogue between the Study Leads, experts and the wider community would strengthen both the quality of the evidence and public confidence in the final report.

The confidence ultimately placed in the study's findings will depend not only on the quality of the evidence gathered, but also on the clarity with which the principles guiding its interpretation are articulated, the openness of its process, and its willingness to remain responsive to new knowledge as the inquiry progresses.

By making those principles explicit from the outset, and by creating a process that is transparent, reflective and genuinely participatory, the Study Leads have an opportunity to establish a framework that extends beyond this review and strengthens environmental decision-making across Tasmania.

Ultimately, the integrity of an independent inquiry is measured not only by the conclusions it reaches, but by the transparency of the principles, questions and processes through which those conclusions are formed. I hope this study becomes an example of that approach and contributes not only to informed policy, but to wiser environmental decision-making for Tasmania into the future.

Thank you again for the opportunity to contribute to the development of this important study. I look forward to following its progress and to engaging with future stages of consultation as the evidence base develops.

Appendix A: Suggested Enhancements to the Draft Study Plan

Purpose

During my review of the Draft Study Plan, I reflected on whether there may be opportunities to strengthen some of the proposed lines of inquiry.

The following questions are offered in that spirit. They are intended to complement, rather than replace, the existing questions by broadening the inquiry to include additional considerations relating to:

- Guiding principles
- Public confidence and legitimacy
- Multiple forms of evidence
- Aboriginal knowledge systems
- Transparency and accountability
- Uncertainty and precaution
- Long-term stewardship
- Systems thinking
- Intergenerational responsibility

Many of these questions are cross-cutting and may be relevant across multiple topics. They are presented under individual topics simply for ease of reference.

Recommendation 1: Apply a Common Framework Across All Topics

Before finalising the Study Plan, I recommend that each topic be reviewed against a consistent set of framing questions.

These might include:

- What is the purpose of this topic?
- What principles should guide this aspect of the inquiry?
- What evidence is required?
- What forms of knowledge should be considered?
- Who should contribute to the evidence base?
- What uncertainties remain?
- What trade-offs may arise?
- How will success be evaluated?

Applying a consistent framework across all topics would strengthen the coherence, transparency and comparability of the inquiry.

Topic 1: Global Context and Industry Trends

Additional questions for consideration include:

- What role does Tasmania wish to play in the future of global aquaculture, and what principles should guide that role?

- How have other jurisdictions built or restored public confidence where salmon farming has become contested?
- What alternative production models are being explored internationally, and what lessons do they offer Tasmania?
- How have Indigenous peoples participated in governance and decision-making about salmon farming internationally, and what lessons might inform Tasmania?
- What lessons can be learned from jurisdictions that have experienced significant environmental, regulatory or social challenges associated with salmon farming?

Topic 2: Environmental Values, Impacts and Stewardship

Additional questions for consideration include:

- What environmental values are we seeking to protect, and how have those values been identified?
- Where are the greatest areas of scientific uncertainty regarding environmental impacts, and how should those uncertainties inform decision-making?
- How should cumulative impacts across multiple stressors be assessed?
- How might Aboriginal knowledge of Sea Country contribute to understanding long-term ecological change and stewardship?
- What indicators best demonstrate ecosystem resilience over time?

Topic 3: Public, Ecosystem and Animal Health

Additional questions for consideration include:

- How might the internationally recognised **One Health** framework inform the assessment of public, ecosystem, wildlife and farmed salmon health?
- How should the study define and assess "health" across these interconnected systems?
- What lessons have been learned from significant mortality events internationally?
- Are existing monitoring and reporting arrangements sufficiently independent and transparent to maintain public confidence?
- How should the study evaluate situations where improving one aspect of health may adversely affect another?

Topic 4: Environmental Governance and International Best Practice

Additional questions for consideration include:

- What principles underpin regulatory decision-making in Tasmania and comparable jurisdictions?
- How do different jurisdictions ensure both the independence of regulators and public confidence in that independence?
- How is the precautionary principle applied where evidence remains uncertain?

- How transparent are regulatory decision-making processes, including publication of reasons for decisions?
- How should the success of environmental regulation ultimately be measured?

Topic 5: Economic Contribution and Regional Development

Additional questions for consideration include:

- How are the economic benefits and costs of the industry distributed across communities, governments and industry?
- What opportunity costs accompany the use of Tasmania's marine and coastal resources for salmon farming?
- How should natural capital and ecosystem services be considered alongside traditional measures of economic contribution?
- How resilient are regional communities to environmental, climatic and market change?
- What constitutes a successful salmon industry from Tasmania's perspective?

Topic 6: Social, Cultural and Community Impacts

Additional questions for consideration include:

- How should the study define and assess the social and cultural values associated with Tasmania's coastal and marine environments?
- How has the industry influenced people's sense of place, identity and connection to coastal landscapes?
- How has the industry influenced trust, social cohesion and community wellbeing?
- How might Aboriginal knowledge systems and relationships with Sea Country contribute to understanding long-term stewardship?
- What social and cultural values does Tasmania seek to protect through the stewardship of its coastal and marine environments?

Topic 7: Climate Resilience, Adaptation and Carbon Management

Additional questions for consideration include:

- What are the ecological, biological, economic and social limits to adaptation under projected climate change?
- How resilient are Tasmania's coastal ecosystems to the combined pressures of climate change and salmon farming?
- What alternative future production scenarios should be evaluated?
- How might Aboriginal knowledge of Sea Country contribute to understanding long-term environmental change and resilience?
- What principles should guide decisions where climate change challenges the long-term viability of existing production systems?

Topic 8: Research, Innovation and Emerging Technologies

Additional questions for consideration include:

- How can partnerships between industry, government and research institutions maintain scientific independence and public confidence?
- How are research priorities determined, and whose interests do they reflect?
- What opportunities exist for community-based monitoring and citizen science to complement institutional research?
- How should success be measured when evaluating innovation?
- How can Tasmania ensure that research and innovation continue to serve the public interest as well as industry development?

For emerging technologies, additional questions may include:

- What environmental, social and animal welfare challenges are emerging technologies intended to address?
- How should emerging technologies be assessed across their full life cycle?
- What environmental, social and economic trade-offs accompany each production system?
- How should the public interest be considered alongside technical and financial feasibility?
- What principles should guide decisions where technical feasibility, environmental outcomes and community expectations do not align?

Topic 9: Future Governance and Global Best Practice

Additional questions for consideration include:

- What principles should guide future regulation of the Tasmanian salmon industry?
- How should "global best practice" be defined, and who determines what constitutes best practice?
- How should the precautionary principle be embedded within future regulatory decision-making?
- What mechanisms should ensure that adaptive management does not become a substitute for preventing environmental harm?
- How should the success of a future regulatory framework be measured through environmental outcomes, public confidence, ecosystem recovery and community trust?

The recommendations contained within this appendix are intended to complement the Draft Study Plan by encouraging questions that strengthen transparency, broaden the evidence base and support thoughtful, principled and accountable decision-making.