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To:	Tasmanian Salmon Study Secretariat
Cc:	[redacted]
Subject:	Ethics and the Independent Study into the Tasmanian Salmon Industry
Date:	Friday, 10 July 2026 4:28:25 AM

Dear Professor Reichelt and Dr Wendy Craik

Thank you for the opportunity to provide input into the Independent Study into the Tasmanian Salmon Industry.

I appreciated our previous discussions and welcome the breadth of the Terms of Reference. They provide a comprehensive basis for examining many of the environmental, scientific, regulatory and economic dimensions of the industry. However, I believe they contain one significant omission that risks limiting the Study's capacity to fully address one of Tasmania's most politically contested and socially divisive public policy issues.

That omission is the absence of a dedicated ethical analysis.

The Tasmanian salmon industry is not simply the subject of scientific disagreement or regulatory scrutiny. The debate reflects fundamentally different values concerning responsibility, justice, stewardship, environmental protection, animal welfare, community wellbeing, cultural identity, and the future relationship Tasmanians wish to have with their marine and coastal environments.

Science can identify impacts.

Economics can assess costs and benefits.

Law and regulation can determine whether existing obligations are being met.

However, none of these disciplines can determine whether particular impacts, trade-offs, governance arrangements, or future directions are ethically justified. Those are normative questions, and they require ethical analysis.

Importantly, the absence of an ethical framework does not make an inquiry value-neutral.

Every review necessarily makes assumptions about what constitutes success, acceptable risk, fairness, responsibility, legitimacy, and the public good. If those assumptions are not examined explicitly, they remain implicit. Ethical analysis does not introduce values into a review; it makes those values transparent, open to scrutiny, and capable of rigorous evaluation.

This is particularly important in a review of an industry that has become one of Tasmania's most politically contested and socially divisive. Much of the disagreement surrounding salmon farming is not simply about scientific evidence. It concerns differing conceptions of justice, stewardship, responsibility, acceptable risk, public trust, and the kind of future Tasmanians wish to create for their shared marine environments.

Without an explicit ethical framework, the Study risks evaluating whether the industry is functioning effectively within existing governance systems without asking whether those governance systems themselves remain legitimate, equitable, and aligned with contemporary community expectations.

In my view, the Study would be considerably strengthened through the inclusion of an

explicit Ethics and Integrity Framework examining questions such as:

- What responsibilities do we owe Tasmania's marine ecosystems and future generations?
- What ethical obligations arise in relation to farmed animal welfare beyond regulatory compliance in marine environments?
- How should environmental risks and cumulative impacts be evaluated where uncertainty exists?
- How should competing public interests be balanced when benefits and burdens are unevenly distributed?
- What constitutes a legitimate social licence and cultural licence to operate?
- How should procedural fairness, transparency, accountability, and public trust be assessed?
- Under what conditions can industrial use of shared marine environments be considered ethically legitimate?

I also believe the Study would benefit from an **Integrity Systems Analysis** of the governance arrangements surrounding the industry.

Integrity systems analysis moves beyond questions of regulatory compliance to examine whether relationships between government, regulators, industry, researchers, advisory bodies, communities, Traditional Owners, and other stakeholders collectively promote transparency, accountability, independence, legitimacy, and public confidence.

This is particularly important where public trust has become contested.

Equally, while the Terms of Reference acknowledge environmental and socio-economic impacts, they do not explicitly examine **social licence** or **cultural licence**. These concepts extend beyond economics or legal compliance to encompass legitimacy, trust, procedural justice, place attachment, cultural values, community identity, and the ethical acceptability of industrial activity within shared public environments -- including Sea and Land Country.

Given the complexity and highly politicised nature of this issue, ethical analysis should not be viewed as supplementary to scientific, economic or legal assessment. Rather, it provides the framework through which competing evidence, competing interests, and competing values can be evaluated transparently and fairly.

As someone whose research focuses on ocean ethics, values-led governance, integrity systems, and social and cultural licence in complex marine policy settings, I respectfully suggest that the inclusion of ethical expertise would strengthen both the credibility of the process and the robustness of its findings.

Should the Independent Study consider that expertise in ethics, multidisciplinary governance, integrity systems, or social and cultural licence would be of value during the course of its work, I would be pleased to contribute in whatever capacity may be helpful.

Thank you again for undertaking this important review. I hope these observations contribute constructively to ensuring the Study provides not only a scientifically robust assessment of the industry, but also a comprehensive examination of the ethical, governance, and societal questions that lie at the heart of this important public debate.

Yours sincerely,

Dr Larelle Bossi

