From:	FRIENDS OF NORTH BRUNY
To:	Tasmanian Salmon Study Secretariat
Subject:	Friends of North Bruny submission – Independent Study of the Tasmanian Salmon Industry
Date:	Sunday, 5 July 2026 11:05:17 AM
Attachments:	FONB Submission Independent Study of the Salmon Industry.pdf

Dear Dr Craik and Dr Reichelt,

Please find attached a submission from Friends of North Bruny Incorporated (FONB) providing feedback on the *Draft Study Plan* and *Draft Stakeholder Engagement Plan* for the *Independent Study of the Tasmanian Salmon Industry.*

As a community organisation representing residents, ratepayers and families on North Bruny, including communities directly affected by salmon farming operations in adjacent waters, we welcome the opportunity to contribute to this important Study.

We appreciate the commitment to an independent, transparent and evidence-based process and hope our comments are useful as the Study Plan and stakeholder engagement arrangements are finalised.

FONB would welcome the opportunity to engage further with the Study Leads as the Study progresses.

Kind regards

Jan Richards AM
Chair
[redacted]

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FRIENDS OF NORTH BRUNY INC.

SUBMISSION ON THE DRAFT STUDY PLAN AND DRAFT STAKEHOLDER ENGAGEMENT PLAN
INDEPENDENT STUDY OF THE TASMANIAN SALMON INDUSTRY 2026

INTRODUCTION

Friends of North Bruny Incorporated (FONB) is a community-based organisation representing residents, ratepayers and families with a strong connection to North Bruny Island.

FONB works to protect and enhance the qualities that make North Bruny a special place to live, visit and care for. Our interests include community wellbeing and safety, environmental stewardship, protection of natural and heritage values, and sustainable and transparent decision-making on matters affecting the Island and its surrounding marine environment.

North Bruny communities have direct experience of salmon farming operations in adjacent waters. In recent years, FONB has engaged with government, regulators and other stakeholders on issues associated with salmon farming, including disease management, antibiotic use, environmental monitoring, community communication and transparency.

Maintaining, protecting and improving a biodiverse Bruny for this generation and those that follow is central to FONB's purpose. For communities on North Bruny, particularly at Killora and Dennes Point, the impacts of intensive salmon farming in adjacent waters are not theoretical. Community members have reported and observed changes in the local marine and coastal environment, including algal growth on rocky foreshores, changes in seabird activity and local fisheries, and concerns about the impacts of increased heavy vessel movements on coastal amenity and foreshore erosion. FONB

considers that these community observations warrant proper consideration alongside scientific, regulatory and industry data through the Study.

It is from this perspective that FONB provides the following comments on the *Draft Study Plan* and *Draft Stakeholder Engagement Plan*.

EXECUTIVE SUMMARY

Friends of North Bruny Incorporated welcomes the commencement of the *Independent Study of the Tasmanian Salmon Industry* and supports the objectives outlined in the *Draft Study Plan* and *Stakeholder Engagement Plan* to deliver an evidence-based, transparent and independent review.

FONB submits that the principal challenge facing the Study is not the identification of issues. Many of the major environmental, governance, social and economic concerns have already been documented through:

- the Legislative Council Inquiry into Fin Fish Farming in Tasmania;
- consultation on the *Tasmanian Salmon Industry Plan 2023*;
- local government submissions;
- scientific reviews and academic literature; and
- community submissions made over many years.

The key issue now is determining which concerns remain unresolved, which recommendations remain unimplemented, where significant evidence gaps remain and what reforms are required to restore public confidence in industry governance.

This approach is consistent with the Terms of Reference, which require the Study to have regard to previous bodies of science, reviews and inquiries, including recommendations and responses of the State Government.

FONB considers that the Study should follow the evidence wherever it leads and should not assume that salmon farming can or should continue at current production levels or in all existing locations. Where environmental carrying capacity, climate change, disease risk or cumulative impacts indicate that current operations are not sustainable, the Study should be prepared to consider changes to production levels, relocation or alternative production models.

FONB therefore recommends that the Study specifically assess the following matters under its proposed work streams.

1. GOVERNANCE, REGULATION AND PUBLIC CONFIDENCE

The Study should determine whether Tasmania's regulatory framework reflects international best practice and whether sufficient separation exists between industry development functions and environmental oversight functions.

The Study should identify:

- recommendations from previous inquiries that remain outstanding;
- the extent to which previous recommendations have been implemented and, where they have not, the reasons for this;
- areas where regulatory responsibilities overlap;
- mechanisms required to strengthen independence and accountability;
- governance reforms necessary to restore public confidence.

FONB considers that the Study should not simply revisit questions previously examined. It should provide a clear account of what has previously been recommended, what action has been taken and what remains unresolved.

2. ENVIRONMENTAL PERFORMANCE AND ECOSYSTEM HEALTH

The Study should evaluate cumulative environmental impacts at ecosystem scale rather than lease scale.

Key questions include:

- What ecological thresholds define sustainable carrying capacity?
- What indicators trigger reductions in biomass or production?
- How are cumulative nutrient loads assessed across interconnected waterways?
- How are the combined impacts of multiple farming operations assessed?
- How are climate change impacts incorporated into carrying-capacity models?
- How are impacts on threatened and vulnerable marine species and ecosystems identified, monitored and addressed?

FONB considers cumulative impact assessment to be one of the most significant unresolved issues facing marine farming regulation. The Study Plan appropriately includes consideration of nutrient loading and environmental capacity. FONB recommends that this work explicitly consider interconnected marine ecosystems, cumulative impacts across farming regions and the effects of industry activity over time.

The Study should also consider ecosystem recovery, including whether environmental impacts are reversible and the timeframes and management interventions required to enable recovery.

3. MONITORING, COMPLIANCE AND TRANSPARENCY

The Study should examine whether current monitoring and reporting arrangements provide sufficient transparency and whether information is made available to communities in a timely and accessible manner.

In particular:

- environmental monitoring data should be publicly accessible wherever possible;
- the timeliness of the release of monitoring, disease and compliance information should be assessed;
- industry-supplied environmental, mortality and compliance data should be subject to appropriate independent verification;
- independent auditing arrangements should be reviewed;
- compliance outcomes should be reported consistently;
- community observations and credible community-led monitoring should be able to contribute to the evidence base;
- the Study should identify opportunities for greater public access to environmental information.

For communities directly adjacent to marine farming operations, delayed or incomplete access to information can contribute significantly to concern and declining public confidence.

FONB's recent experience has demonstrated the importance of communities receiving clear, timely and authoritative information when events occur that may affect surrounding waters and marine environments.

4. DISEASE MANAGEMENT, ANTIBIOTIC USE AND ANTIMICROBIAL RESISTANCE

The emergence of Piscirickettsiosis (SRS) and the emergency use of florfenicol have heightened public concern regarding disease management, environmental impacts and antimicrobial resistance.

These issues have had particular relevance for North Bruny. The use of florfenicol at a salmon farming lease in waters adjacent to North Bruny generated significant community concern and resulted in FONB seeking information and clarification from government, regulators and other stakeholders. The experience highlighted broader questions about the timeliness and accessibility of information available to affected communities, environmental monitoring, public communication and preparedness for significant disease events.

FONB therefore welcomes the Study Plan's proposed examination of antibiotic and chemical use, environmental and public health risks, and antibiotic stewardship.

The Study should assess:

- current antimicrobial resistance (AMR) monitoring programs;
- baseline environmental AMR information;
- environmental exposure pathways;
- monitoring of sediments, shellfish and wild fish populations;
- the adequacy and timeliness of communication with affected communities;
- future surveillance requirements, including genomic monitoring approaches.

The Study should also review lessons learned from recent disease outbreaks and identify measures necessary to improve preparedness, monitoring, response and community communication for future disease events.

5. COMMUNITY WELLBEING, SOCIAL LICENCE AND AMENITY

FONB submits that social licence should be assessed as a measurable component of industry performance.

The Study should establish:

- indicators of community confidence and trust;
- measures of community wellbeing and amenity;
- processes for meaningful and ongoing community participation;
- mechanisms for incorporating community perspectives into future decision-making.

The Study should recognise that community concerns extend beyond environmental impacts and include governance, transparency, communication and trust.

Social licence should not be assumed from the existence of regulatory approvals or consultation processes. The Study should consider how community confidence can be assessed over time and how concerns raised by communities are acknowledged, investigated and addressed.

The Study should also consider impacts on recreational fishing, public access to waterways, ecosystem services and other uses of public marine space.

6. ECONOMIC PERFORMANCE AND COMMUNITY BENEFIT

The Study should assess the overall economic contribution of the industry while also considering:

- regulatory and monitoring costs;
- environmental management and remediation costs;

- impacts on other industries, including tourism, commercial fishing and recreational activities;
- impacts on Tasmania's reputation as a clean, green destination and producer;
- costs borne by government and the broader Tasmanian community;
- competing and complementary uses of public marine resources;
- community benefits arising from the use of public marine resources.

FONB considers that transparent assessment of both benefits and costs is essential for informed public policy. This is particularly important given the Terms of Reference requirement to assess whether the costs and benefits to Tasmania are being fully considered and, where relevant, recovered.

7. ABORIGINAL HERITAGE AND SEA COUNTRY

The Study should ensure that Aboriginal perspectives are integrated throughout the review and that Tasmanian Aboriginal people are directly engaged in determining how matters relating to Sea Country and cultural heritage are considered.

This should include consideration of:

- cultural values associated with Sea Country;
- impacts on cultural heritage values;
- opportunities for ongoing participation in marine planning and decision-making;
- approaches to future management identified through direct engagement with Tasmanian Aboriginal communities.

FONB considers that Aboriginal knowledge, leadership and perspectives should be incorporated throughout relevant areas of the Study rather than treated as a standalone issue.

8. CLIMATE CHANGE AND FUTURE INDUSTRY RESILIENCE

FONB supports the Study's proposed consideration of climate change, adaptation and future industry resilience. Particular consideration should be given to the implications of increasing water temperatures, emerging disease risks and harmful algal blooms for the long-term sustainability of open-pen salmon farming in Tasmania's coastal waters.

The Study should consider whether current production systems and regulatory arrangements are sufficiently adaptive to respond to rapidly changing marine conditions and whether clear environmental thresholds and management triggers are required.

Where evidence indicates that environmental conditions are no longer suitable for existing production levels or farming locations, the Study should consider the full range

of management responses, including reduced production, relocation and alternative aquaculture models such as land-based or hybrid systems.

STAKEHOLDER ENGAGEMENT PLAN

FONB supports the intent and guiding principles of the *Draft Stakeholder Engagement Plan,* including its commitment to independence, transparency, evidence-based engagement and inclusivity. Friends of North Bruny also welcomes the recognition of regional and coastal communities as a key stakeholder group.

However, FONB considers that additional measures are required to ensure equitable participation. Community organisations often do not have access to the technical expertise, financial resources or dedicated staff available to industry, government agencies and research institutions. This imbalance should be recognised in the design of the engagement process.

FONB recommends:

- access to independent technical support where required to assist community organisations to understand and respond to complex scientific and regulatory information;
- plain-language summaries of technical material and key findings;
- publication of submissions and supporting evidence wherever confidentiality requirements do not apply;
- in-person community engagement in directly affected communities, including Bruny Island;
- publication of information papers and preliminary findings, with an opportunity for stakeholder comment before final conclusions are reached;
- opportunities for communities to comment on emerging findings and identified evidence gaps as the Study progresses;
- establishment of a publicly accessible **I**ssues and Evidence Register identifying key matters raised through stakeholder engagement, the evidence considered, identified evidence gaps and where those matters are addressed through the Study.

The *Draft Stakeholder Engagement Plan* indicates that the Study Plan will be a dynamic document informed by stakeholder interactions and that new areas of exploration may be added as knowledge grows. FONB strongly supports this approach.

Meaningful engagement should also enable stakeholders to understand how their input has influenced the Study. An Issues and Evidence Register would strengthen transparency and provide a clear line of sight between stakeholder participation, evidence gathering and Study outcomes.

CONCLUSION

FONB supports a transparent, evidence-based and independent review of Tasmania's salmon industry. The Study presents an opportunity not only to assess environmental outcomes but also to examine whether governance arrangements, transparency mechanisms, community participation processes and regulatory systems remain fit for purpose.

For communities such as North Bruny, which live alongside salmon farming operations and have direct experience of recent disease management and antibiotic use, the effectiveness of regulation, monitoring and communication is not an abstract policy issue. It directly affects community confidence and trust.

The Study should be prepared to follow the evidence wherever it leads. This includes identifying where existing practices are sustainable, where changes are required and, where necessary, considering changes to production levels, locations or production models.

The ultimate test of the Study will be whether it identifies practical reforms capable of addressing unresolved concerns, responding to evidence gaps and restoring public confidence, while ensuring environmental protection, community wellbeing and sustainable economic activity are balanced in accordance with Tasmania's Resource Management and Planning System.

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