From:	Maria Riedl
To:	Tasmanian Salmon Study Secretariat
Cc:	Maria Riedl
Subject:	Submission to Salmon Review Draft Study Plan for Maria IE Riedl-5 July 2026
Date:	Sunday, 5 July 2026 5:23:21 PM
Attachments:	Salmon Review Draft Study Plan -July 2026 Submission by Maria IE RIedl.pdf

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Please confirm you have received my submission and that you can open it and read it. This is very very important to me.

Kind regards and many thanks

Maria IE Riedl B.S.Ed., M.Env.L., M.Env.Gov
[redacted]

Salmon Review Draft Study Play-July 2026

This 'independent' review should assess whether industry can operate without impacts on our environment, communities and other industries: industry reduction, relocation, alternative aquaculture models, and or, phase-out of farming in unsuitable areas.



Please accept this as my submission:
Maria IE Riedl B.S.Ed., M.Env.L., M.EnvGov - 5 July 2026
[redacted]

Introduction

It is clear that "Tasmania's independent EPA" has been caught by government. They are making rules and shifting them to suite the salmon industry with the 'objective': comparable with resource and management system which actually does NOT apply to our waterways. The Tasmanian EPA is no longer 'independent' (if it has ever been allowed to be) always operating with industry in mind, and consider this: the government directs the EPA and it also does not fund it to enable it to be effective and independent.

This review should be both positive and negative and to me it does not appear to be neutral, the way it has been framed, as it is too biased towards industry, in minimising and not rigorously investigating scientific evidence that points to avoidable environmental impacts. The EPA is underfunded eg: an underfunded EPA, CSIRO and IMAS …are looking for money and when they do a study, its terms of reference appear to be narrow, directing it towards an outcome that benefits the government's backing of the salmon industry. eg: ship pumping oxygen into to Macquarie harbour to benefit salmon industry, NOT the critically endangered Maugean Skate, the florfenicol usage which by the way is a PIG antibiotic (land animal)
… EPA failures to compare mortalities with losses.

Remember how change of laws ban fish farms in Canada and Washington and why?!

Recommendation 3: Salmon farms must be transitioned out of inshore waterways. The government implementation is "poor" in our freshwater systems or basically non existent. Have a read of what is polluting the Derwent River right at this moment. Increasing the size of smelters and approving non-composting sites next to rivers and other onshore areas shouldn't be allowed by DPAC.

We should eb looking for solutions not just describing problems and then doing anything other than another study, another study, another study! We need to actually know how much damage , how many times the industry is sneakily bypassing regulations eg: Macquarie Harbour, where they are oxygenating water with the international salmon companies are profiting for this and fail to pay taxes bc we pay for those 'bubbles'. If the industry was on land, none of this would be allowed to happen (We can only hope). the nutritional value of this mass produced polluting salmon is "zilch". Transfats such as chicken, cows blood and heavy metals are part of fish feed.

-exporting salmon despite losing 25% loss of production
-supporting the "continuation of salmon' is the key theme in this study not to genuinely consider reducing end eventually phasing out and completely foreign owned industry which has the ear of government who appears to lack the fortitude to look and act on the scientific evidence that is clearly before it
-there is a complete failure to protect public health and community well-being by ensuring that this industry is NOT allowed to pollute our inshore waterway and Macquarie Harbour.
-self-reporting and self-assessing is simply ridiculous an fails to halt or even document and report on the spread of pollution via fish poop (over 60,000 to 100,000 in a pen!) and 5 tons of the antibiotic florfenicol being dumped in our waterways and spreading over 14kms from where it was used! unacceptable surely?
-'***D'Entrecasteaux Channel Marine Farming Development Plan*** was approved in 1997. A number of circumstances have arisen which indicate a review of this Plan is appropriate; in particular further potential for industry expansion and the requirements to ensure that any expansion occurs in a sustainable manner'. Has this been actually done?

-the MFP Act requires periodicreuviews of approved development plans to ensure that the objectives of resource management, having regard to any relevant changing circumstances are achieved to the MAXIMUM extent possible.
-have a close study of the ***Draft D'Entrecasteaux Channel Marine Farming Development Plan February 202***2 and the Environmental Impact Statement to accompany the ***Draft D'Entrecasteaux Channel Marine Farming Development Plan February 2002*** please!
-it states that the 'Planning Authority must review a marine farming development plan where required to do so by the Minister or at least every 10 years to ENSURE that the objectives of resource management having regard to any relevant changing circumstances, are achieved to the MAXIMUM extent possible!! has this been done??
-it is critical that the voices of independent scientists within Tasmania are listened to as they are identified as key stakeholders in the Draft Stakeholder Engagement Plan.
-all feedback MUST be published and this is critically important so the community can understand where changes have originated
-where is the assessment of what role government policy and political influence has had in enabling the impacts of the salmon industry
-what government policies and initiatives have enabled the salmon industry to operate without proper oversight and regulation?
-have so-called independent institutions such as IMAS and CSIRO been even sufficient government funding to fulfil their mandate, or are they reliant on support for industry and therefore compromised in their ability to make the recommendations that are needed to protect the environment?
-has the EPA filled its role as an independent regulator, or have they been influenced by the government's position?
-this industry if enabled by the Government, and the industry is a donor to both major parties. It is not apolitical and it is not independent. It is a beneficiary of PUBLIC resources and PUBLIC FUNDS.
-the extent to which current and previous governments have facilitated the destruction of the marine environment MUST be ASSESSED>
-it is critical that the community is brought along in EVERY STAGE of this Draft Study.
-we are concerned that the stakeholders must register their interest at the beginning of the study period to stay connected with the study. different phases of consultation MUST be advertised, in newspapers and on community platforms
-the study must ask: can the salon industry exist in the Tasmanian marine environment without adverse impacts?
-sustainable development means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities tp provide for their future

social, economic and cultural well-being and for their health and safety and sustaining the potential of natural and physical resources to meet the reasonable foreseeable needs of future generations and safeguard the life-supporting of air, water, soil and ecosystems; and avoiding, remedying or mitigating any adverse effects or activities on the environment
-questions to answer: 1. are current production levels environmentally sustainable 2. reduce the industry, relocate it or phase it out 3. consider tourism and Tasmania's "clean, green" reputation 4. recreational fishing and public access to water ways, amenity and community well-being yet again 5. ecosystem services and other uses of marine space
-there must be public face-to-face community consultation during the study!!!!!
-release information papers and preliminary findings BEFORE conclusions are finalised please!!
-CUMULATIVE IMPACTS across al farming regions, bothe marine and land form ocean warming
-what is the ecological carrying capacity and ecosystem recovery from the use of eg pig antibiotics (5 tons of the stuff!!!)
-must also include the impacts on threatened species like the Maugean Skate and the Red Handfish and others!
-The industry data MUST be independently verified
-all monitoring data MUST be publicly released ensuring transparent and independent science NOT industry and political bias

This is vitally important: There must be a review of the regulatory system itself demonstrating clearly regulatory independence and accountability. We, the community MUST trust in decision-making processes!!!! there must quite CLEARLY be transparency around lobbying and influence.

Importantly as well: do current regulations adequately protect communities and the environment?!

This study is NOT about "jobs, jobs. jobs, jobs which is the political mantra of both government and industry which happen to be mechanising as I have physically been to Huon aquaculture farm at Port Huon open days as well as on the 7th floor on a tour of how they feed the 60,000 to over 100,000 salmon via pushing a button and viewing computer screens!!!!! Mind you they DON'T show the area on the bottom underneath fish pens nor 30m out and further bc it would be an ugly disgusting video!!!!

Your Objectives include: the study is to be undertaken in a manner that supports ACTIVE engagement with the Tasmanian COMMUNITY, industry, the science community and Members of Parliament. Do not forget my community because WE CARE about our marine and land environments and also all creatures that depend upon it.

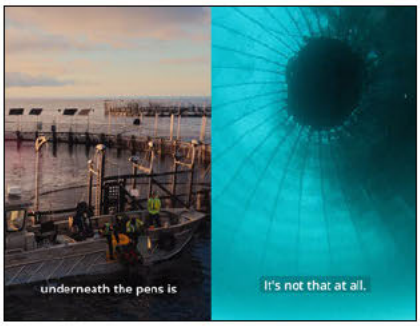
I want to actively contribute evidence please. We have a farm next to the Huon River so we know or suspect what happens to hatcheries upstream!

I would also like the publicly available information papers covering the range of issues to be considered in the study.

Do not ignore or belittle our insistence on science and independence being at the forefront-NOT jobs, jobs, jobs, jobs and $$$$$$ and foreign companies taking us for a ride because our government is in their $$$ pockets. Climate change, warming waters and all that it brings to the fore basically leads to the Precautionary Principle when you don't know everything, you don't know cumulative impacts etc you don't allow an industry which we know is polluting out inshore water and Macquarie harbour!!!









The above is just one photo of dead salmon around Tasmania.

Please take time to read the articles I have attached:

https://www.abc.net.au/news/2026-06-30/tas-florfenicol-salmon-antibiotic-amount-confirmed/106860194

https://www.abc.net.au/news/2026-06-19/tasmanian-salmon-ad-complaint-upheld/106818276

https://www.abc.net.au/news/2026-05-27/maugean-skates-released-into-macquarie-harbour-imas/106726458

https://www.abc.net.au/news/2025-10-22/scientists-prepare-to-release-captive-adult-maugean-skates/105856276

https://www.abc.net.au/news/science/2023-05-16/ancient-tasmanian-maugean-skate-on-path-for-extinction-within-10/102318426

https://www.abc.net.au/news/2016-11-02/protection-of-prehistoric-maugean-skate-not-being-prioritised/7985776

https://www.abc.net.au/news/2016-10-31/salmon-farmer-says-tas-government-ignored-overstocking-warning/7978770

https://www.abc.net.au/news/2016-04-29/environmentalists-ready-to-fight-increase-in-salmon-farming/7368882

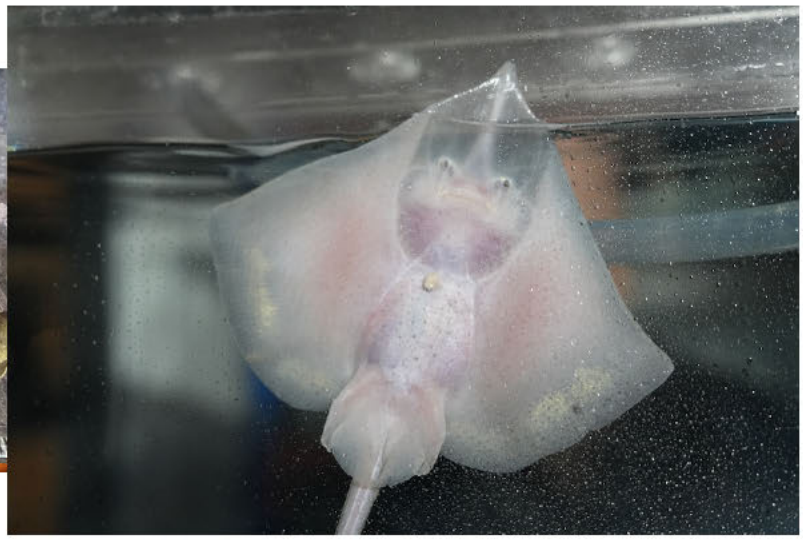
https://www.abc.net.au/news/2016-03-01/tassal-declares-macquarie-harbour-salmon-farming-sustainable/7210338

https://tasmanianinquirer.com.au/news/hill-street-grocer-under-pressure-over-macquarie-harbour-fish-farm-threat-to-endangered-maugean-skate/



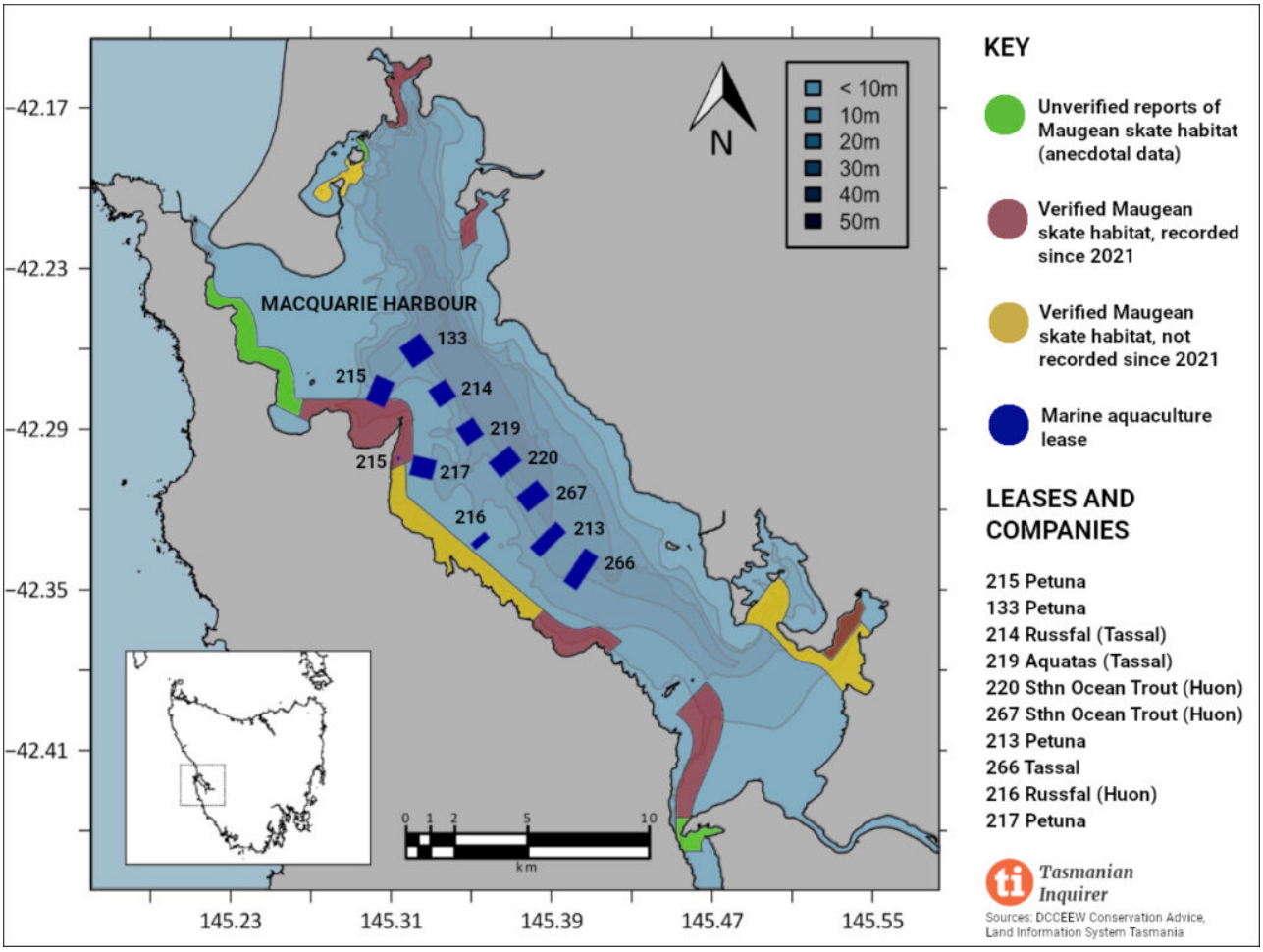

Premium Tasmanian
Atlantic Salmon
and Ocean Trout
SUSTAINABLY, ETHICALLY
GROWN & PROCESSED
IN TASMANIA
AVAILABLE IN
HILL STREET STORES
Petuna







Macquarie Harbour and Salmon leases by all three foreign owned companies. Not one company has RSPCA certification either for salmon here or elsewhere in Tasmanian waters!!!



Salmon farming, heavy metal pollution, changes flow regimes and climate change are all impacting Macquarie Harbour. *(Supplied: IMAS)*









https://tasmanianinquirer.com.au/news/salmon-company-confirms-use-of-antibiotic-at-hatchery-in-hobarts-water-catchment/

Thank you

Regards Maria



From: [redacted]
To: Tasmanian Salmon Study Secretariat
Cc: [redacted]
Subject: Antibiotic traces found in eels, water samples and sediments near Tasmanian salmon hatchery on Derwent River
Date: Monday, 6 July 2026 9:29:05 AM

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id like this added to my submission please!

cheers
Maria IE Riedl

https://tasmanianinquirer.com.au/news/antibiotic-traces-found-in-eels-water-samples-and-sediments-near-tasmanian-salmon-hatchery-on-derwent-river/

Antibiotic traces found in eels, water samples and sediments near Tasmanian salmon hatchery on Derwent River

Antibiotic residues have been found in eel, sediment and water samples from a freshwater salmon hatchery on the banks of the Derwent River, according to a report submitted to the Tasmanian Environment Protection Authority.

An interim report by Marine Solutions Tasmania, a consultant for Huon Aquaculture, revealed the company used almost 52 kilograms of the controversial antibiotic oxytetracycline (OTC) at its Meadowbank hatchery, in the Derwent Valley, between January 21 and February 9 to combat an outbreak of bacterial enteritis. The World Health Organization has warned overuse of OTC in the food industry could lead to the development of antibiotic-resistant “superbugs”, which it described as “one of the biggest threats to global health”.

The report attributes the initial disease outbreak to a 5C increase in the temperature of water drawn from the Derwent River. The

company used 38.28 kg of OTC to treat salmon in seven tanks at the hatchery. Ten days after the initial disease outbreak, Huon applied a further 13.42 kg of OTC to fish in two other tanks. The Meadowbank plant is one of 10 "flow-through" freshwater hatcheries in the state that draw water from and discharge effluent into a river.

The company and EPA did not release details of the antibiotics use for more than two weeks until *Tasmanian Inquirer* made inquiries after receiving a tip-off. Companies with environmental licences for freshwater salmon hatcheries are not required to monitor antibiotic residues or report their use, but Huon voluntarily reported its use to the EPA.

The EPA finalised [Pdf] the monitoring schedule for water, sediment and fish samples on January 23, two days after Huon started using OTC at the hatchery. As a result of the delay, sediment samples were not collected at five sites in the Derwent River until six days after the first use of the antibiotic. Sheenagh Neill, a spokesperson for environment organisation Marine Protection Tasmania, criticised the EPA over the delay in establishing the monitoring schedule. "This report shows that once again the EPA has been caught unawares and left scrambling to try and catch up with antibiotic pollution of a major river by a salmon company," she said.

> ***"Hiding the numbers of dead fish behind claims of commercial disadvantage is unacceptable and does not meet community expectations".***
>
> ***Meg Webb, independent MP***

Eight weeks of sampling revealed no OTC residues at the hatchery water intake at or above the reporting threshold of 0.01 micrograms per litre (µg/l). It was a different story elsewhere.

One week after the last use of OTC, sediment from the effluent

sludge tank showed a peak reading of 1800 milligrams per kilogram (mg/kg), exceeding the reporting threshold of 0.01 mg/kg. Levels well in excess of the reporting limit continued for three months. Huon disposed of sludge from the tank at Southern Waste Solutions' waste management plant at Copping.

Sediments at the point of discharge into a small stream leading to the Derwent River remained six times higher than the reporting threshold for OTC in early May. Residues were recorded at lower levels just downstream of the discharge point and exceeded the reporting threshold only once at a point 500 metres downstream. The report, completed in June and published by the EPA late last week, said sediment sampling was "ongoing" because the regulator required monitoring to continue until consecutive samples returned results below the reporting threshold.

Twelve water samples from three sites exceeded the reporting threshold for OTC residues. One collected 500 metres downstream of the hatchery six days after antibiotic use began was 0.5 ug/l, 50 times the reporting threshold.

Three samples from short-finned eels had OTC residues above the limit. Two of these occurred three weeks after the end of OTC use. The highest OTC concentration in an eel was 0.05 mg/kg, five times the reporting threshold, but well below the 0.2 mg/kg maximum residue standard for human consumption.

A spokesperson for Huon said the use of antibiotics on veterinary advice was "one of the most important tools for best practice animal health".

Unanswered questions

In January, the EPA said new monitoring requirements for antibiotic residues would apply to all freshwater hatcheries and told the ABC the new standard would be in place by the end of

March. An EPA spokesperson told *Tasmanian Inquirer* last week the introduction of new standards "is currently underway" but did not provide a specific timetable.

Meg Webb, an independent member of the Legislative Council and the chair of a 2020 inquiry into finfish farming, said the agency needed to explain the delay. "Full disclosure of antibiotic use and subsequent monitoring data must be a licensing requirement for freshwater fisheries," she said. "If the EPA has failed to put that in place close to six months after the Huon incident, the community deserves an explanation for the delay and a firm commitment to those licensing changes being expedited."

The number of fish that died in the disease outbreak has not been publicly released. Huon said it could not disclose details during the two-year production cycle of fish due to "anti-competitive considerations". Webb said the industry operated in public waterways and must be held accountable for animal welfare. "Hiding the numbers of dead fish behind claims of commercial disadvantage is unacceptable and does not meet community expectations," she said.

From: [redacted]
To: Tasmanian Salmon Study Secretariat
Cc: [redacted]
Subject: The EPA's credibility gap over antibiotic use
Date: Monday, 6 July 2026 9:33:05 AM

And please add this article to inform you of EPA collusion to my submission.

thank you

Maria IE Riedl

https://tasmanianinquirer.com.au/news/comment-the-epas-secrecy-over-antibiotic-use-highlights-a-credibility-problem/

Comment: The EPA's secrecy over antibiotic use highlights a credibility problem

That Tasmania's Environment Protection Authority and Huon Aquaculture said nothing publicly for more than two weeks about the use of antibiotics at a salmon hatchery in Hobart's water catchment is a telling indicator of their preference for secrecy over public disclosure.

First, a recap. *Tasmanian Inquirer* contacted Huon early on February 5, requesting responses to five questions regarding the use of an antibiotic at its Meadowbank Hatchery on the banks of the Derwent River. Huon did not respond. The next day, we re-sent the questions to Huon. Similar questions were forwarded to the EPA.

Huon and the EPA confirmed the use of an antibiotic at Meadowbank, that it wasn't a legal requirement to monitor for residues and that the company had voluntarily disclosed the information to the EPA. The EPA confirmed the legal loophole would be closed. Huon disclosed the use of oxytetracycline (OTC) while the EPA ignored that question. Neither responded to

a question on when antibiotic use commenced and finished.

Our initial story last Tuesday triggered extensive media coverage. Leon Compton's Tasmania Mornings program on ABC Radio featured interviews with Meg Webb, an independent member of the Legislative Council, and Depha Miedecke, Huon's general manager of aquaculture. Huon disclosed that there had been two 10-day courses of antibiotics but did not provide specific dates. The EPA provided a general statement but made no one available for an interview. ABC Radio news, the Country Hour, ABC TV news and online, *The Mercury*, *Tasmanian Country*, Pulse and other media outlets also reported the issue.

> ***"It is rather telling that the use of an antibiotic in a major water catchment only came to light because of a tip-off from a courageous member of the public, rather than from the independent regulator charged with protecting the public interest."***

Despite significant media coverage, the EPA initially provided little additional information. The agency created a new page on its website disclosing that the first 10-day course of antibiotics treatment commenced on January 21 and the second on January 31.

In response to subsequent queries from *Tasmanian Inquirer*, the EPA confirmed that Huon first informed it of the use of antibiotics at the hatchery on January 21, and that monitoring began that day. The following day, the EPA decided to mandate the reporting of antibiotic use and residue monitoring at the 19 freshwater hatcheries across the state. On January 23, the EPA formally notified [Pdf] Huon that it must monitor antibiotic residues for up to 96 days at specific locations.

Tasmanian Inquirer asked the EPA and Huon how much OTC was used at the hatchery, but neither responded. However, Huon

confirmed the use of the antibiotic to treat bacterial enteritis, an intestinal disease that Tasmanian research suggests can be caused by soybean meal in fish feed.

In a statement to the ABC, the Department of Health said the director of public health was informed of the EPA's use of OTC "shortly before" treatment started. Given that Huon informed the EPA on January 21 and treatment began the same day, it appears public health officials likely had only a few hours' advance notice. The department insisted there was "no risk" to human health and that any residues would be at very low levels by the time the water reached the Bryn Estyn water treatment plant about 40 kilometres downstream.

The health department's analysis, if taken at face value, prompts a couple of obvious questions. If there was so little risk from antibiotic residues to the environment and human health downstream from the Meadowbank Hatchery, why was there such a dismal failure by the EPA and Huon to inform the public of their use at the outset and subsequently answer basic questions? And if the EPA begrudgingly disclosed only limited information in the days after the cover-up emerged, how can the public have any faith that it will be transparent when the risks are higher?

In a Facebook post after our initial story, Huon insisted it would "continue to be transparent about our operations". Days later, we asked why, given the company's practice of real-time public disclosure of antibiotic use in the marine environment, it didn't do the same for a drug used in freshwater. Huon did not respond.

It is rather telling that the use of an antibiotic in a major water catchment only came to light because of a tip-off from a courageous member of the public, rather than from the independent regulator charged with protecting the public interest.