From:	Donald Coventry
To:	Tasmanian Salmon Study Secretariat
Subject:	Stakeholder engagement plan
Date:	Thursday, 2 July 2026 1:21:43 PM
Attachments:	Form n.eml.msg

Hi, please find the North Huon Collectives response to the engagement plan as attached.
Cheers Donald

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North Huon Collective
Submission on the Draft Stakeholder Engagement Plan
Independent Study of the Tasmanian Salmon Industry

To the Independent Study Leads,

The North Huon Collective welcomes the opportunity to comment on the Draft Stakeholder Engagement Plan for the Independent Study of the Tasmanian Salmon Industry.

We understand that the study is intended to examine the Tasmanian salmon industry, including the adequacy of regulation, environmental protection, community impacts, economic questions, and the industry's future direction. Our submission is directed specifically to the proposed engagement process. It is not intended to be a full submission on the broader environmental, regulatory, animal welfare, freshwater, hatchery, transport or waste-management issues associated with the industry. Those issues will need to be addressed through the study itself.

Our central concern is that the engagement process must be strong enough to build public confidence. It is not enough for engagement to occur. The process must be visibly independent, accessible to affected communities, transparent in how evidence is gathered and weighted, and capable of identifying risks that may otherwise be missed or minimised.

The salmon industry has considerable resources, technical advisers, consultants, communications capacity and regular access to government. Local communities do not have comparable resources. Many affected residents are volunteers, small business owners, farmers, fishers, landholders, ratepayers, retirees or people already carrying the burden of local environmental and social impacts. A fair engagement process must recognise this imbalance and actively correct for it.

We therefore ask that the Stakeholder Engagement Plan be strengthened in the following ways.

1. Engagement must be place-based and active

The engagement process should not rely mainly on written submissions, peak-body meetings or scheduled stakeholder interviews. These methods can easily favour organisations with professional staff and technical capacity.

The study should include place-based engagement in affected regions, including the Huon Valley, the D'Entrecasteaux Channel, Bruny Island, Macquarie Harbour-linked communities, hatchery-adjacent communities, freshwater catchment communities, transport-route communities, and communities affected by shore-based industry infrastructure.

For the North Huon, this means recognising that salmon industry impacts are not confined to marine lease areas. Communities may be affected by hatcheries, water use, waste handling, trucking movements, odour, noise, river health, biosecurity risks, dead fish handling, and future land-based expansion. These issues need to be included in the engagement design from the outset.

2. Community evidence should be treated as evidence, not sentiment

Community members often hold detailed local knowledge. They observe changes in waterways, road use, truck movements, odour, noise, wildlife, fish mortalities, algae, foam, water clarity, infrastructure activity and cumulative local impacts over long periods of time.

The engagement process should not treat such evidence as anecdotal concern or stakeholder sentiment. Local observation should be recorded, tested where possible, and included in the evidence base.

We ask that the final Stakeholder Engagement Plan make clear how community evidence will be received, recorded, verified where possible, and incorporated into the study's analysis.

3. A public issues register should be created

The study should establish and maintain a public issues register.

This register should record:

the issue raised;

the location or region affected, where relevant;

the source category, such as community, industry, regulator, scientist, worker, Traditional Owner, local government or conservation organisation;

the evidence or documents provided;

whether the issue relates to marine farming, hatcheries, freshwater use, waste, animal welfare, public health, transport, planning, regulation, economics, climate risk or social impact;

whether the issue has been accepted, contested, unresolved or referred for further investigation;

the study team's response or proposed next step.

This would help prevent important concerns from disappearing into broad consultation summaries. It would also improve public confidence by showing that issues raised by communities have been heard and tracked.

4. The process must explain how competing evidence will be weighted

The draft plan should be clearer about how the study will deal with competing evidence.

For example, the study may receive industry-funded science, regulator reports, government briefings, academic research, community observations, whistleblower evidence, expert ecological advice, animal welfare concerns and Traditional Owner evidence. These sources are not all the same, but none should be dismissed simply because it does not come through a formal institutional channel.

The final engagement plan should explain how the study will assess conflicts of interest, independence, data gaps, unpublished information, commercial confidentiality claims, and claims made by parties with a direct financial interest in the outcome.

5. Consultation with industry must be transparent

We recognise that industry must be consulted. The salmon companies, their workers, suppliers and representative bodies hold relevant information and have a legitimate interest in the study.

However, public confidence will be damaged if industry appears to have privileged access to the study process.

The final plan should include transparent reporting of industry engagement, including the number and type of meetings held, the categories of participants, the broad topics discussed, and any documents or data provided. Commercially sensitive details can be protected where genuinely necessary, but confidentiality should not be used to shield matters of public interest from scrutiny.

6. The study should include affected workers and contractors, not only company leadership

The salmon industry is not only represented by executives, industry associations and consultants. Workers, contractors, truck drivers, processing workers, hatchery staff, divers, maintenance workers, vessel operators and others may hold important knowledge about industry practices, safety, fish health, waste handling, mortality events and operational realities.

The engagement strategy should include safe channels for workers and contractors to provide information without fear of retaliation. This may require confidential interviews, protected evidence pathways, and clear assurances about how sensitive information will be handled.

7. Aboriginal engagement must be substantive

The engagement plan should ensure that Tasmanian Aboriginal people and organisations are engaged in a way that is culturally appropriate, adequately resourced and not compressed into ordinary stakeholder consultation.

Impacts on Sea Country, cultural values, marine ecosystems, freshwater systems, shorelines and places of cultural significance should be treated as central to the study, not as a separate or secondary issue.

8. Climate risk and cumulative impact must be included in engagement

The study should not treat climate change as a distant future issue. Warming waters, marine heatwaves, low-flow events, oxygen stress, drought, freshwater competition, fire risk, disease pressure and fish welfare are already relevant to the salmon industry's current and future operation.

Community engagement should therefore ask people directly about climate-related risks and cumulative impacts, including how future industry expansion may interact with warming waters, freshwater limits, waste systems, mortality events, transport pressures and local planning decisions.

9. The study should identify what information is missing

A strong engagement process should not only gather views. It should identify gaps in public information.

The study should record where communities, councils, researchers or regulators do not have access to information needed to understand industry impacts. This may include information about fish mortalities, antibiotic use, chemical use, hatchery discharges, waste disposal, freshwater extraction, lease compliance, benthic impacts, oxygenation, escapes, disease events, transport routes, complaints, enforcement actions and monitoring data.

Where information is missing, the study should say so clearly.

10. Interim findings must be open to meaningful public response

The engagement plan should include a clear process for public response to interim findings before the final report is completed.

This is important because communities need the opportunity to test whether their evidence has been understood accurately. If community concerns are summarised incorrectly, narrowed too early, or excluded from the analysis, there must be a practical opportunity to correct the record before final conclusions are drawn.

11. The language of the engagement process should be accessible

Many members of the public will not respond to a process that is written in technical, bureaucratic or industry language.

The study should provide plain-English summaries, clear issue papers, accessible meeting formats, and practical guidance on how individuals and small community groups can participate. Public meetings should be scheduled at times and places that are workable for local residents, not only for paid professionals.

12. The study must avoid pre-judging the future of the industry

The engagement process should not assume that the central question is how the industry should grow, relocate or modernise. Communities must be able to raise more fundamental questions about scale, location, environmental limits, regulatory failure, social licence, animal welfare, climate risk and whether some forms of activity are no longer appropriate in some places.

The final engagement plan should make clear that the study is not simply a pathway to future industry certainty. It is an opportunity to test whether the current regulatory and management system is adequate, whether public trust can be restored, and whether the industry is operating within environmental and social limits.

Conclusion

The North Huon Collective supports a genuinely independent and evidence-based study of the Tasmanian salmon industry. However, the credibility of that study will depend heavily on the quality of its engagement process.

A good engagement process will not simply invite submissions. It will actively seek out affected communities, treat local knowledge seriously, disclose how evidence is used, identify gaps in information, and provide a transparent way to track unresolved issues.

We ask that the Draft Stakeholder Engagement Plan be strengthened before it is finalised, particularly by including:

place-based community engagement in affected regions;

a public issues register;

clear methods for weighing competing evidence;

transparent reporting of industry engagement;

safe channels for workers and contractors;

substantive Aboriginal engagement;

explicit attention to climate risk, cumulative impact, freshwater systems, hatcheries, waste, transport and land-based infrastructure;

and a genuine opportunity to respond to interim findings before final conclusions are reached.

Without these safeguards, there is a real risk that the engagement process will reproduce the same imbalance that has contributed to public distrust of salmon industry regulation in Tasmania. With them, the study has a better chance of producing findings that affected communities can understand, test and have confidence in.

Yours sincerely,

North Huon Collective