From: [redacted]
To: Tasmanian Salmon Study Secretariat
Subject: Salmon Study Submission
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Attachments: Submission_Independent Study of the Salmon Industry in Tasmania_E Carr.pdf

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Dear Dr Craik and Dr Reichelt,

Please find attached a submission on the draft stakeholder engagement and study plans for the Independent Study of the Salmon Industry in Tasmania.

Kind regards,

Eloise Carr

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Environment and integrity
[redacted]

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Independent Study of the Salmon Industry
Study Leads
Dr Wendy Craik and Dr Russell Reichelt
Email: salmonstudy@tas.gov.au

Sunday, 5 July 2026

Dear Dr Craik and Dr Reichelt,

Please find following my submission on the draft stakeholder engagement and study plans for the Independent Study of the Salmon Industry in Tasmania (the Study).

I am a public policy professional with over 20 years of experience driving evidence-based policy. Currently a freelance consultant, for 5 years before that I led the Tasmanian branch of the Australia Institute, working on government accountability and transparency mechanisms and strengthening environmental regulation. I instigated the first Tasmanian State of Environment Report in 15 years[1] and played a critical role in exposing the salmon industry's damage to World Heritage Macquarie Harbour. One of my research papers formed the basis for crossbench negotiations on a new Marine Environment Act for Tasmania.[2] Prior to this I was a public servant for 15 years in coastal and ocean governance in state, national and international roles.

The Independent Study of the Salmon Industry was negotiated by crossbench Members of Parliament in exchange for their support to form government in 2025. This followed the mass salmon die off earlier in 2025 and over a decade of other damage being wrought by the industry. Despite spin from the industry and Tasmanian Government, Australia Institute polling shows that seven out of 10 Tasmanians want fish farms out of sheltered, inshore waters.[3]

First Nations First

Here, I do not intend to speak for palawa, but rather to direct Study leads to engage directly with palawa, through the Tasmanian Aboriginal Corporation. I note with concern that palawa, Tasmania's Aboriginal people, are not being considered in the Study as rights holders. I support the recognition of Aboriginal rights to ownership of their land and heritage, and am deeply concerned by government failure to seek free, prior and informed consent on decisions about their land and heritage, which breaches the UN Declaration on Rights of Indigenous Peoples.

[1] Unfortunately, the Report did not include assessment of coastal water quality or the salmon industry's impacts, despite this being a finding of the 2021 Australian State of Environment Report.
[2] It's Time - A proposal for a Tasmanian Integrated Marine Estate Act
[3] Polling – Tasmanian Election Issues; Reduce Inshore Salmon Farming to Protect Tassie Coast: Research

Tasmanian Parliamentary Inquiry into Fin Fish Farming

The 2022 Report on the Tasmanian Parliamentary Inquiry into Fin Fish Farming highlighted the many problems faced by the industry.[4] The Inquiry's top recommendation was for a revised Salmon Industry Growth Plan to be developed as one aspect of an overarching, integrated Marine Plan for Tasmania. The Tasmanian Government supported, or supported in principle, the majority of the Inquiry's recommendations, recognising the need for a major overhaul of the industry.[5] However, there has been little progress towards implementing those recommendations since.

Recommendation 3 is to develop a plan, in consultation with industry, scientific and community stakeholders, to reduce inshore fin fish farming sites, with priority given to ceasing operations in sensitive, sheltered and biodiverse areas. The government supported this "in part" essentially handing such decisions to the EPA to consider on a case-by-case basis.

Regulatory capture by the industry

My overarching feedback on the Study plan (and Terms of Reference) is that it does not appropriately address regulatory capture by the industry. This goes far beyond any "closeness" articulated in Topic 4. As Human Rights lawyer and former Liberal government advisor, Greg Barnes said in his recent newspaper column, scrutiny of the salmon industry is clearly needed, "at the very least, on the basis it has captured the regulator".[6] When it comes to this industry's impact on World Heritage, this appears true at both state and federal government levels.

Possible outcomes of the Study

The Terms of Reference (TORs) for the Study refer to informing decisions that seek to "balance" industry, community and environmental outcomes. This seems to assume the industry will continue. Open sea cage finfish aquaculture is not sustainable – the science is clear. Socially and economically, it fails to deliver on jobs and tax, and profits go offshore.

The TORs and/or the Study plan should make it clear from the outset that it is possible for any recommendation to arise from the findings of the Study. The Study should seek to inform future policy decisions about the industry, including what, if any form it takes, to ensure Resource Management and Planning System objectives are met.

Impacts on the Tasmanian Wilderness World Heritage Area

Globally, Tasmania's Wilderness is the equal highest-ranked World Heritage Area, meeting an extraordinary 7 out of 10 criteria - three cultural and all four natural. It is one of the world's

[4] 2022 Tasmanian Parliamentary Inquiry into Fin Fish Farming
[5] Response to the Legislative Council Sub-Committee "A" Report on Finfish Farming in Tasmania
[6] Hobart Mercury - Why the Greens are Tassie's real opposition Party, 28 June 2026

largest and most spectacular wilderness areas and its ancient Aboriginal heritage predates colonisation by tens of thousands of years.

Both Macquarie Harbour and endangered Maugean skate are recognised for their World Heritage value because of their direct links to Gondwana. They contribute to the Outstanding Universal Value of the Tasmanian Wilderness. The federal Environment Department has concluded the salmon industry "is having, and is likely to have" a "significant impact" on World Heritage, including both the Harbour and the skate.[7] Of all the threats to the Tasmanian Wilderness, the most urgent is the imminent threat of extinction of Maugean skate.

Over the last three years, charismatic Maugean skate have shot to fame as the poster child for what's wrong with environmental regulation in Australia. That the skate's demise is primarily to fish farming pollution is now accepted.

The Australian government recently misled UNESCO by suggesting skates are recovering. To the contrary, evidence shows the population is aging, and with few juveniles, it is approaching a demographic cliff. Numbers declined in 2025 with more skates found within the World Heritage Area, away from fish farms. Further, the $9.2 million Captive Breeding Program[8] has failed. Now rebranded as "captive management", genetic tests show all hatchlings were fertilised in the wild.[9] No captive breeding has occurred. The skates captured for that purpose have either died or been returned to the Harbour.

At least the Oxygenation Offset Program in Macquarie Harbour has an honest title – it only aims to offset oxygen needs of salmon.[10] Thus, governments are now bioengineering a World Heritage harbour so the salmon industry can continue to destroy the values Tasmanians, and the world, would rather be protected. Not only are Tasmanians gifting the industry free pollution (licencing fees do not cover regulation costs and the industry pays little to no tax[11]), taxpayers are paying the industry to develop and implement the offset scheme to the tune of $18.3 million.

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[7] Albanese government rejected advice on Tasmanian salmon farming impact before passing pro-industry laws; https://www.dcceew.gov.au/sites/default/files/documents/79741-1.pdf

[8] https://minister.dcceew.gov.au/plibersek/media-releases/national-threatened-species-day-new-steps-save-maugean-skate; https://nre.tas.gov.au/Documents/NRE%20RTI%20017%20-%202025-26.pdf; https://pulsetasmania.com.au/news/maugean-skate-captive-breeding-effort-boosted-by-2-1-million-injection/

[9] Cradle to Coastlines Autumn Edition

[10] https://minister.agriculture.gov.au/collins/media-releases/joint-media-release-watt-maugean-skate

[11] Salmon spin and pollution all a bit fishy; The Tasmanian salmon industry's talk about boosting the economy does not include paying tax; Small Fish, Big Pond - Tasmanian salmon industry job numbers & tax payments;

Civil society representatives will attend the July 2026 World Heritage Committee meeting to call for key accountability measures to be introduced, including a mission to Tasmania and State of Conservation reporting.[12]

Effectiveness of the legal framework

Federal government responsibilities to regulate the industry should be thoroughly examined, as should efforts to strengthen regulation through Parliamentary reforms and litigation in Australia and internationally. There are examples of Human Rights based approaches to successful litigation against salmon companies in Chile. Argentina has effectively banned open sea cage aquaculture. The USA and Canada also have legislated restrictions.[13]

In Australia, despite promising to strengthen national nature laws, in March 2025, the Australian Government changed the law, instead weakening protections and restricting the availability of review mechanisms in Australia's Environment Protection and Biodiversity Conservation (EPBC) Act 1999.[14]

Requests for reconsideration of a 2012 decision that allowed expanded fish farming in Macquarie Harbour should have led to a federal Environmental Impact Assessment. The original decision was found not to be a controlled action (with conditions) and therefore did not require assessment under Australian law. However, new scientific evidence of significant impacts triggered the review.

But rather than allowing the reconsideration to be finalised, the Australian Government changed the law, and the Minister subsequently decided the new provision applied and that he could no longer change the 2012 decision.[15] This decision is now being challenged in Australia's federal court by civil society organisation, NWTas for Clean Oceans Inc.[16]

In the 2023 update to the State of Conservation Report to UNESCO's World Heritage Committee, Australia committed to strong legislative protection.[17] The reality is the Australian Government has done the opposite. The government could have allowed the law to do its job and protect the skate, by allowing the reconsideration process to be completed, but they chose to change the law and protect the salmon industry instead.

Recent changes to Australian nature laws do not address this change. The newly established Environment Protection Agency provides capacity for greater oversight, but recent government actions indicate there is no political will to do so. Further, when it comes to law

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[12] Tasmania's Wilderness World Heritage Area at Risk; https://wilderness.org.au/images/uploads/Letter-to-UNESCO-ICOMOS-and-IUCN_Dec-2025-on-TWWHA.pdf

[13] Commercial scale, land based, 100% closed system alternatives are being utilised in Iceland and elsewhere.

[14] Letter_Tasmanian-Wilderness-World-Heritage-Area-and-Maugean-skate_April-2025-final.pdf

[15] https://www.abc.net.au/news/2025-08-14/macquarie-harbour-marine-farming-reaffirmed-commonwealth/105650836

[16] Save the Maugean skate court case

[17] Update to the State Party Report on the state of conservation of the Tasmanian Wilderness World Heritage Area (Australia) – 2023

enforcement, many are concerned that the conditions attached to the original 2012 approval are not being met. Civil society groups have brought this to the attention of the Australian Government to no avail.

At the state level, legislation that governs this industry is woefully inadequate. Salmon farming in Tasmania is regulated though a dual licencing system, whereby salmon farming operators need to have both an environmental licence (issued by the EPA) and a marine farming licence, issued by the Department of Natural Resources and Environment Tasmania (DNRE) under the *Living Marine Resources Management Act 1995* (Tas) (LMRM Act).

There is no formal opportunity for the public to make submissions regarding either environmental or marine farming licence renewals. Criteria that decision makers can consider in refusing to renew a licence are broad and include environmental constraints, considerations of improper conduct, and past contraventions of conditions of the licences. Despite ample evidence to support a refusal, decision-makers appear unwilling to do so.[18] Opportunities for merit-based challenges to the issuing of licences are limited or non-existent.

Environmental Impact Assessment

Salmon farming in Tasmania has never been subject to an Environmental Impact Assessment under Australian law. This was reported in 2025 to the 80th Session of the UN General Assembly in the Report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment.[19, 20]

The UN Report clarifies States obligations for environmental impact assessments and highlights essential improvements to evaluate impacts effectively and comprehensively. The report states:

> "In Tasmania, Australia, since 2012 industrial salmon farms have proliferated without any environmental impact assessments being conducted, threatening endemic species, such as the Maugean skate."

The 44th session of the World Heritage Committee reiterated to Australia the importance of carrying out impact assessments, and urged submission to the Committee, for review by the Advisory Bodies, details of any project that may affect the site's Outstanding Universal Value,

[18] https://australiainstitute.org.au/wp-content/uploads/2023/10/Annexure-C_Letter-to-Director-EPA-from-Australia-Institute-Tasmania.pdf; https://australiainstitute.org.au/wp-content/uploads/2023/10/28092023_Letter_Australia-Institute-to-NRE-Secretary.pdf

[19] UNGA report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment, p.5.

[20] https://australiainstitute.org.au/post/bombshell-foi-reveals-fish-farms-have-been-inadequately-assessed-for-impact-on-threatened-species-and-world-heritage/

in accordance with Paragraph 172 of the Operational Guidelines.[21] In the case of fish farming adjacent to the Tasmanian Wilderness, no such assessment has been undertaken.

The importance of independent science

The study should clarify the importance of independent, non-industry funded research. There is a wealth of independent scientific research and advice available in Tasmania, such as through the non-government, non-industry funded areas of research at UTAS, the CSIRO, the Tasmanian Independent Science Council and former academics. The Tasmanian State of Environment Report should provide another source of information, but the 2024 report failed to do so.[22] Independent scientists have played a key role in raising awareness about salmon farming impacts, for example, 14 Professors and five Fellows from the Australian Academy of Science were among more than 30 experts who wrote to the Environment Minister to defend the science behind the plight of the Maugean skate.[23]

Free pollution, few jobs, no tax

According to the salmon companies' own documents there are 60 salmon farming workers based on the West Coast, not the 400 so often claimed.[24] State-wide there are around 1,500 jobs in the salmon industry.[25] The salmon jobs in Macquarie Harbour make up just 7% of the industry. The salmon industry itself makes up less than 1% of Tasmanian jobs. Over 80% of these jobs are in Hobart and the south east.

The industry uses indirect employment (or multipliers) to exaggerate its importance. This approach has been criticised by both the ABS and the Productivity Commission as being unrealistic, particularly in small regional economies.

According to Australian Tax Office data, no company tax was paid by Tasmanian salmon farms between 2019-2025, despite selling over $4 billion worth of fish in that time.[26]

Stakeholder engagement

The Study Plan's list of stakeholders misses many of the grass roots community groups around Tasmania as well as national environmental NGOs, such as the Australian Marine Conservation Society, the Wilderness Society and Australian Conservation Society.

The CSIRO recently released comprehensive attitudinal research showing how deeply unpopular the salmon industry is with Tasmanians.[27]

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[21] Decision 44 COM 7B.75, adopted during the extended 44th session of the World Heritage Committee (WHC/21/44.COM/18)
[22] Underfunded and painfully slow – is the Tasmanian government serious about protecting the state's natural wonders and its people?
[23] Top Australian scientists unite in defence of science on Maugean skate - The Australia Institute
[24] 60 jobs: The salmon industry finally comes clean
[25] https://australiainstitute.org.au/report/small-fish-big-pond/
[26] https://australiainstitute.org.au/post/salmon-spin-and-pollution-all-a-bit-fishy/
[27] Troubled waters or shared futures - Navigating social risk: CSIRO research

Lastly, Tasmanians watched in horror as the recent South Australian harmful algal bloom devastated wildlife, businesses and communities. Scientists have made it very clear that Tasmania already has all the ingredients for a similar disaster here. The vast majority of excess nutrients in many Tasmanian waterways comes from fish farms. To be more precise, the poo and other discharge from salmon farms in Macquarie Harbour generates the same amount of nitrogen pollution as sewage discharged by a city of half a million people – that's more than double Hobart's.[28] With next summer's temperatures forecast to be catastrophic, the salmon industry urgently needs to stop polluting to avoid a similar disaster in Tasmania.

Yours sincerely,



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[28] https://australiainstitute.org.au/post/salmon-spin-and-pollution-all-a-bit-fishy/