From:	John Pitt
To:	Tasmanian Salmon Study Secretariat
Cc:	Stewart Frusher; Graeme Wells
Subject:	Independent Study of the Tasmanian Salmon Industry - Draft Study Plan - Representation - Attention Study Leads
Date:	Wednesday, 17 June 2026 1:46:06 PM
Attachments:	Independent Study of the Tas Salmon Industry - Draft Study Plan - Representation.Final.pdf

Dear Study Leads,

Please find attached a short submission identifying four methodological considerations that may assist the Independent Study in addressing its stated objective.

The observations are intended as a constructive contribution to strengthening the assessment of evidence, evaluation of options and development of conclusions, while remaining consistent with the scope of the Draft Study Plan.

I would be happy to clarify any aspect of the submission

Best wishes for the study, and

Regards
John Pitt
E: [redacted]
M: [redacted]

Independent Study of the Tasmanian Salmon Industry
Draft Study Plan - Process Improvements

In reviewing the Draft Study Plan and Draft Stakeholder Engagement Plan, I have identified four methodological considerations that, if addressed, would strengthen the Study's ability to answer its stated objective and improve transparency in the assessment of evidence, evaluation of options and development of conclusions.

The following observations are offered as a constructive contribution to strengthening the analytical framework through which the Study assesses whether *regulation and management are achieving sustainable outcomes consistent with Tasmania's Resource Management and Planning System (RMPS)*.

Context

The Draft Study Plan identifies a broad range of environmental, economic, social and regulatory issues associated with the salmon industry. These include matters such as environmental impacts and carrying capacity, biodiversity and threatened species, fish health and mortality, public health and food safety, chemical and antibiotic use, economic contribution, community impacts, scientific rigour and regulatory effectiveness.

While organised around six broad topics, the Draft Study Plan appears to encompass approximately 25–30 distinct issue areas.

A practical way of approaching the Study may be to focus on a more limited number of key unresolved issues and systematically examine the evidence, uncertainties, options and trade-offs associated with each. This approach has the advantage of concentrating effort on matters that are most relevant to stakeholders and most likely to influence future policy and management decisions.

However, an issue-based approach, whilst necessary may not be sufficient in itself to answer the Study Objective. Ultimately, the Study must also determine whether *current regulation and management arrangements are achieving sustainable outcomes consistent with the RMPS*. This requires a framework for evaluating how each issue contributes to, or detracts from, the environmental, economic, social and governance objectives reflected in the RMPS.

The challenge for the Study is not simply to identify issues or describe stakeholder perspectives, but to provide a transparent and evidence-based basis for determining whether *current regulation and management arrangements are achieving the outcomes sought under the RMPS* and, if not, what changes are required.

The observations that follow are therefore not intended to replace an issue-focused approach. Rather, they are intended to strengthen the process by which major issues

are assessed, evidence is evaluated, alternative options are compared and conclusions are reached.

1. The Study should establish a clear framework for evaluating how major industry issues contribute to, or detract from, the achievement of sustainable outcomes under the RMPS.

The Study Objective is ... *to assess whether regulation and management are achieving sustainable outcomes consistent with Tasmania's Resource Management and Planning System (RMPS)*.

The Draft Study Plan identifies a broad range of environmental, economic, social and regulatory issues. However, it is not yet clear how the Study will determine whether particular outcomes associated with those issues represent success, partial success or failure against the objectives of the RMPS.

Unless this is addressed, the Study risks becoming a comprehensive assessment of impacts, benefits and stakeholder perspectives without being able to reach a clear conclusion on the central question posed by its own objective: *whether current regulation and management are achieving sustainable outcomes consistent with the RMPS*.

The RMPS establishes objectives relating to:

- the protection of ecological processes and biodiversity;
- sustainable economic development and resource use;
- community wellbeing and public participation; and
- integrated, transparent and accountable decision-making.

These objectives provide the foundation for assessing whether sustainable outcomes are being achieved. However, the RMPS does not itself define measurable indicators of success or failure.

Without first translating these RMPS objectives into a practical assessment framework, it will be difficult to determine whether current regulation and management arrangements are achieving sustainable outcomes.

An early task of the Study should therefore be to establish a framework that links the major issues examined by the Study to the environmental, economic, social and governance outcomes sought under the RMPS and provides a consistent basis for evaluating evidence, regulatory effectiveness and alternative future industry pathways.

One possible translation of the RMPS objectives into assessable outcomes is:

RMPS Objective Area	Outcome Test
Protection of ecological processes and biodiversity	Environmental quality, biodiversity and ecological function are maintained within scientifically defined limits, with evidence that adverse effects attributable to salmon farming remain localised, reversible and consistent with agreed recovery objectives.
Sustainable economic development and resource use	The industry generates enduring net benefits to Tasmania and regional communities after accounting for the value of environmental assets, ecosystem services, economic and social impacts, opportunity costs and the interests of future generations.
Community wellbeing and participation	Communities have access to the information necessary to understand risks and trade-offs, meaningful opportunities to influence decisions affecting them, and appropriate protection from environmental, social and economic risks, while sharing fairly in the benefits arising from salmon farming activities.
Integrated, transparent and accountable decision-making	Regulatory and management systems are demonstrably capable of identifying risks, responding to emerging issues, enforcing compliance, adapting to new information and achieving stated environmental, economic and social outcomes.

While these outcome areas provide a useful translation of RMPS objectives, the Study will ultimately need to develop more specific outcome tests for the major issues under examination. For example, environmental outcomes may need to address matters such as environmental limits, recovery trajectories, reversibility of impacts and ecosystem resilience, while governance outcomes may need to address transparency, monitoring adequacy, compliance and regulatory effectiveness. Economic outcomes may need to consider net economic benefits, opportunity costs and intergenerational impacts, while social outcomes may need to address the distribution of benefits and impacts across affected communities.

This issue-based approach would allow the Study to focus on the most relevant matters while maintaining a clear line of sight to the broader objectives of the RMPS. Without such issue-specific outcome tests, there is a risk that broad statements of success remain open to differing interpretation and cannot be consistently assessed.

The purpose of such a framework is not to predetermine the outcome of the Study, but to establish a transparent basis for assessing whether sustainable outcomes are being achieved and for comparing alternative future industry pathways.

The Study should also identify measurable indicators, trends, confidence levels, and trigger points for each outcome area. The purpose is not necessarily to reduce sustainable development to a single numerical index, but to provide a transparent and consistent basis for assessing performance and evaluating alternative future scenarios against the objectives of the RMPS… and for ensuring that adaptive action is taken if performance is lacking.

2. The Study should explicitly incorporate counterfactual analysis.

The Draft Study Plan contains a comprehensive assessment of impacts, risks and benefits, but places relatively little emphasis on understanding why current outcomes have occurred or how they would differ under alternative scenarios.

To assess the effectiveness of regulation and management, the Study should explicitly consider counterfactual questions such as:

- What would environmental, economic and social outcomes be in the absence of salmon farming?
- What outcomes would occur under stronger or weaker regulatory settings?
- What outcomes would occur under alternative production systems or future development pathways?
- What outcomes would occur if current practices and regulatory settings remain substantially unchanged over the next 10–20 years?

Without such analysis, the Study risks describing current conditions without being able to confidently attribute causes or assess the effectiveness of regulatory or management interventions.

Counterfactual analysis is essential to distinguish between outcomes arising from salmon farming, climate change, catchment influences, regulatory interventions and other contributing factors. It also provides a more robust basis for evaluating future policy options.

3. The Study should establish a transparent framework for integrating environmental, economic, social and governance evidence.

The Draft Study Plan contains extensive material across environmental, economic and social topics, but does not explain how these different forms of evidence will ultimately be combined to answer the Study Objective.

The Study should therefore develop a transparent assessment framework that:

- evaluates environmental, economic, social and governance outcomes on a consistent basis;
- identifies trade-offs and synergies;
- documents areas of consensus, uncertainty and disagreement;
- applies confidence ratings to key findings; and
- explains how conclusions and recommendations have been derived.

The framework should be capable of assessing alternative future industry pathways against the outcomes framework described above and should clearly identify:

- what is gained;
- what is lost;
- who benefits;
- who bears costs;
- where uncertainty remains, and the risk allocation associated with that;
- how conclusions have been reached.

Such a framework would substantially improve transparency, assist stakeholder understanding and strengthen confidence that the final recommendations are evidence-based and consistent with the RMPS.

4. The Study should establish a transparent framework for seeking, evaluating and incorporating stakeholder evidence.

The Draft Study Plan and Draft Stakeholder Engagement Plan place considerable emphasis on stakeholder engagement. However, while the process for gathering information is reasonably clear, the process by which stakeholder contributions will be evaluated, weighted and incorporated into the Study's findings is less clear.

The Study will receive information from a wide range of sources including industry participants, regulators, scientists, Indigenous groups, environmental organisations, community members and local businesses. These groups possess different forms of knowledge and experience and may contribute scientific evidence, operational information, monitoring data, local observations, professional judgement, lived experience and value-based perspectives.

The Study should therefore establish and publish a transparent evidence assessment framework that clearly describes:

- how information will be sought from different stakeholder groups;

- how submissions will be analysed and categorised;
- how factual claims, expert interpretation and value judgements will be distinguished;
- how evidence quality and reliability will be assessed;
- how areas of agreement, disagreement and uncertainty will be documented; and
- how stakeholder contributions will ultimately influence findings and recommendations.

One possible approach would be to separately assess:

Information Type	**Assessment Approach**
Factual claims	Verification against available evidence and datasets
Scientific and technical evidence	Assessment of methodology, quality, peer review and reproducibility
Professional and operational experience	Assessment of relevance, consistency and supporting evidence
Community and Indigenous knowledge	Assessment of consistency, corroboration and relevance to local conditions
Value judgements and preferences	Documentation and consideration in evaluating future options and trade-offs

The Study could further strengthen transparency by assigning confidence levels to major findings and explicitly documenting areas of consensus, disagreement and uncertainty.

The purpose of such a framework is not to privilege any particular stakeholder group. Rather, it is to ensure that all contributions are considered fairly, transparently and consistently, and that stakeholders can clearly understand how evidence has informed the Study's conclusions and recommendations.

Why These Considerations Matter

These observations are not intended to expand the scope of the Study. Rather, they are intended to strengthen the process by which evidence is evaluated, conclusions are reached and recommendations are developed.

In my view, the four considerations correspond to the key analytical steps required to answer the Study Objective:

1. How will the major issues examined by the Study be evaluated against the environmental, economic, social and governance outcomes sought under the RMPS?

2. Why are current outcomes occurring?

3. How will alternative future pathways be evaluated?

4. How will evidence from stakeholders be collected, assessed and incorporated into the analysis?

The Draft Study Plan contains a large amount of material relating to environmental impacts, economic contribution, social effects, regulatory arrangements, stakeholder perspectives and future technologies. These are all important. However, they are ultimately inputs into these four more fundamental questions.

Addressing these questions explicitly would help ensure that the Study moves beyond describing impacts and stakeholder views towards providing a clear, transparent and evidence-based assessment of whether ***current regulation and management are achieving sustainable outcomes under the RMPS*** and, if not, what changes are required.

Prepared by John Pitt June 2026

E: [redacted]
M: [redacted]

Endorsed by

- Professor Stewart Frusher
- Dr Graeme Wells, Adjunct Senior Lecturer, Tasmanian School of Business and Economics