

TACL Submission – Okehampton Bay Salmon proposal

Marine Farming Planning Review Panel

GPO Box 44, HOBART,

TAS 7001

September 26th, 2016

Submission from the Tasmanian Abalone Council Ltd (TACL) regarding the Proposed Salmonid Farming Operations at Okehampton Bay

This submission is lodged by:

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The Tasmanian Abalone Council notes the following:

- *The Marine Farming Planning Review Panel (the Panel) invites written submissions on the terms of reference, as part of its independent assessment of proposed salmonid marine farming operations at Okehampton Bay in the Great Oyster Bay and Mercury Passage Marine Farming Development Plan area.*
- *Only submissions addressing the terms of reference will be considered by the Panel.*
- *Submissions will be considered by the Panel as part of its report to the Minister for Primary Industries and Water.*

Submissions are to address one or more of the following;

- a. The environmental science supporting the proposed environmental monitoring and management of salmon farming at Okehampton Bay within the Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 (as reviewed in 2007) area; and;*
- b. The adequacy of the environmental baseline data and surveys to allow the Director, Environmental Protection Authority to establish a contemporary environmental management regime for the purposed marine farming activity; and*
- c. The adequacy of the Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 to allow for the implementation of a contemporary environmental management regime for proposed salmonid marine farming at Okehampton Bay.*

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This short submission from the TACL raises the following key concerns in relation to the proposed Salmonid Farming Operations at Okehampton Bay:

1. Proximity of proposed salmon farm site to productive abalone reef systems

The Tasmanian abalone fishery depends on complex environmental factors to replenish and maintain healthy stock levels. Many of these environmental factors are not well understood and are beyond the control of managers, fishers and researchers.

Tasmanian wild abalone is harvested from one of the world's most pristine marine environments, has a high nutritional value and is a 100% natural and organic product. Because it is "hand-harvested" there is no by-catch and has negligible environmental impact on the reef ecosystem. The Tasmanian Abalone fishery was one of the first fisheries in Australia accredited as 'sustainable' under the Commonwealth *Environment Protection & Biodiversity Conservation Act 1999*.

Australian (and Tasmanian) wild abalone is recommended for consumption by the World Wildlife Fund (WWF) because it is recognised and acknowledged that it is harvested from well managed sustainable fisheries and is harvested in an ecologically friendly way.

The primary risk to sections of the Tasmanian wild abalone fishery that are adjacent to open-cage salmonid farming systems relates to the medium to long-term environmental degradation of inshore abalone reef habitat caused by sustained salmon based nutrient and sediment inputs.

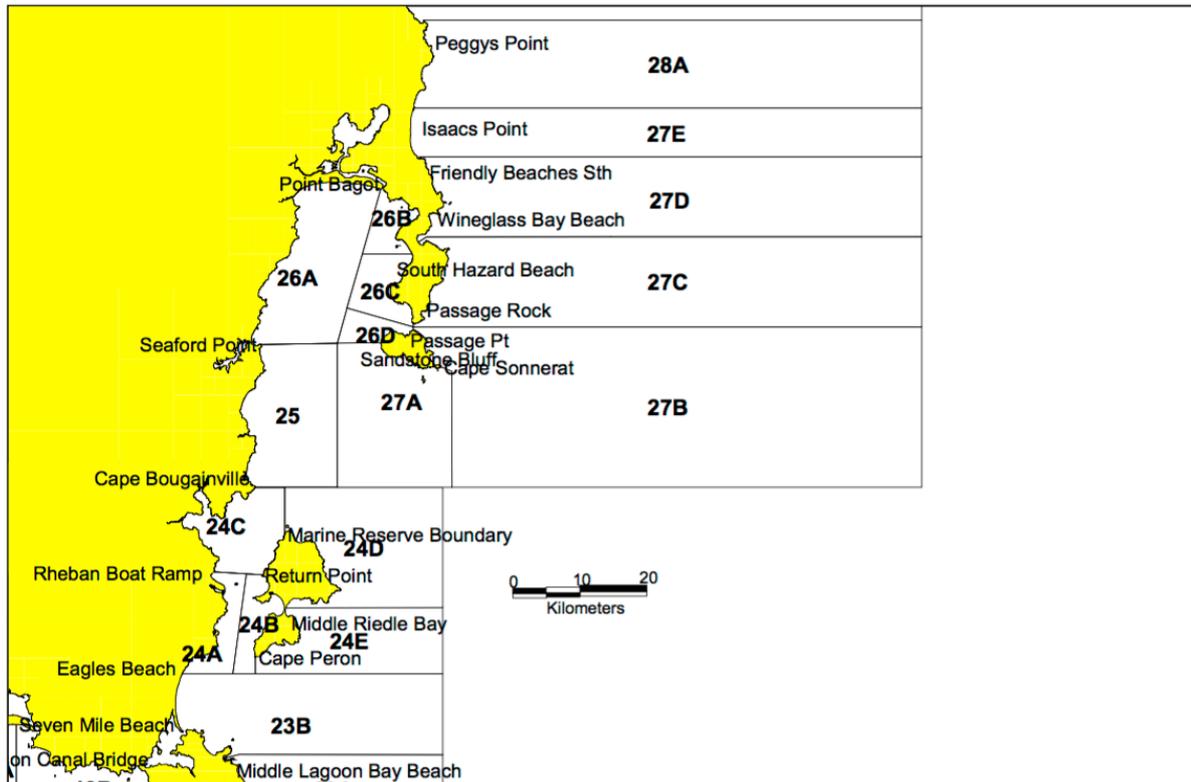
The proposed Okehampton Bay salmon farm lies within Abalone Fishing Block 24 (Maria Island and Mercury Passage) – please refer to below map.

Reference to the *Tasmanian Abalone Fishery Assessment 2014* (Tarbath and Mundy, July 2015) shows that Abalone Block 24 has produced an average catch of 53.4 Tonnes of Abalone per year from 2006 to 2014. At current beach prices, this block generates \$3 million per year with \$213,000 of this sum paid in royalties to the Tasmanian Government. Block 24 produces over 3% of the State's total Abalone catch per year and nominally supports 3 to 4 abalone divers (based on the nominal tonnage available per diver for the 2016 Total Allowable Catch).

Neither Tassal nor the Tasmanian Government have provided any scientific assessment of the potential impact of salmonid waste from the proposed Okehampton Bay salmon farm on the health and sustainability of the abalone fishery surrounding Maria Island and in particular, those abalone reefs that lie within Mercury Passage.

Therefore, insofar as the ongoing viability of the abalone population in Block 24 is concerned, it is simply not possible at this point in time to predict with any degree of certainty the likelihood or detrimental consequence of the open-cage salmon farming operations as currently proposed.

Map 7: Lower East Coast



2. Terms of Reference and the public consultation period

The Terms of Reference of this review are considered by the TACL to be highly restrictive and not conducive to genuine engagement of a broad range of marine users and other potentially impacted community and business stakeholders.

The timeframe to lodge submissions is also considered to be “way too brief”. The TACL has been unable to access independent scientific expertise in the short period of “public consultation” available in order to prepare a comprehensive and technically robust assessment of the impacts of the Okehampton salmon proposal on the nearby wild abalone resource.

The TACL is therefore seeking a much-increased period of public consultation – a minimum extension of six months would be adequate.

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3. Environmental assessment, monitoring and management

With specific regard to the Terms of Reference of this review:

The TACL notes the original *Great Oyster Bay and Mercury Passage Marine Farming Development Plan 1998* is now 18 years old.

The TACL also notes that the *Baseline Environmental Assessment of Marine Farming Lease #263 at Okehampton Bay Finfish farm February 2000* is now 16 years old.

The TACL further notes that the science underpinning the environmental assessment, monitoring and management associated with aquaculture planning processes was critically lacking in a number of key areas when both of the above documents were originally produced nearly 2 decades ago. This simple and rather obvious fact is acknowledged in the Background section of FRDC Project 2015 - 024 *Managing ecosystem interactions across differing environments: building flexibility and risk assurance into environmental management strategies*” which states:

*“It is important to ensure that salmon farming development is sustainable. Improved farming technologies and expansion into new farming locations over the last decade **have highlighted some concerns regarding current environmental monitoring/ management approaches** (this was identified as a priority in the 2014 FRDC Open Call). The current standards for management and regulation of environmental impacts are **based on research conducted over 10 years ago.**”* (excerpt from page 3 of 14 of the FRDC Funding Application for project 2015 – 024 – my highlighting)

The TACL has consistently raised its concerns publicly and to the Primary Industries Minister regarding the future expansion plans of the Tasmanian Salmonid industry since 2014. Please refer to *Risks to the Tasmanian Abalone Fishery from further expansion of the Salmonid industry – October 2014*. This document is attached as an appendix to this submission.

During 2014/15, IMAS scientists worked with salmon companies and other marine resource users to develop an FRDC project application aimed at improving the environmental management outcomes of salmon farming. Representatives from the Tasmanian abalone industry, the rock lobster industry, the recreational fishing community and from the broader community and environmental advocacy groups were consulted, identifying a range of concerns with respect to the sustainability of multiple use management within coastal ecosystems.

The resultant *Fisheries Research and Development Corporation (FRDC)* project is entitled “2015/024 - *Managing ecosystem interactions across differing environments: building flexibility and risk assurance into environmental management strategies*” and commenced in July 2015 - **one of its objectives is to provide a better assessment of the potential risk to reef systems from sediment deposition and nutrient dispersion from fish farms.**

The following two paragraphs are excerpts from the FRDC Project application:

“The aim of this project is to improve understanding of how Atlantic salmon farming operations interact with their surrounding environment and other fisheries, and where there is the potential for negative

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interactions. Consequently, this project will provide benefits not just to the salmon industry in Tasmania but to all of the associated users of the coastal ecosystems in which salmon farming is currently active. This research will improve our understanding of nutrient cycling and the potential for local scale eutrophication in and around salmon farms on a regional basis. This knowledge will help refine existing management strategies to ensure that salmon farming is managed sustainably in all regions; which is important to reassure other users (e.g. coastal fisheries, shellfish aquaculture and recreational fishers) that they can co-exists with salmon farming in the coastal zone.”

“In order to double production by 2030 the Salmon industry in Tasmania must consider alternate production approaches and expansion into new areas. However, maintaining high environmental performance (a priority for both the industry and its regulators) requires an understanding of how farming in new areas might change environmental interactions. In order to ensure that management remains best practice, and farms continue to be efficient and sustainable, assessment of the local scale impact/ recovery dynamics and potential interactions with other resource users is required in newly developed farming environments and under different farming technologies. In addition understanding how farms interact with the various processes and ecosystems in the water-bodies where they occur and the various scales for those interactions (local, medium and broad-scale) will provide an important basis for establishing an effective strategy for system- wide management, including management of interactions with other users of the water-bodies.”

The TACL has managed to secure two positions on the 2015 – 024 project steering committee. The steering committee has met twice and the TACL will continue to have input into the project going forward.

The TACL notes that this project is not due for completion until June 2018.

It is the view of the TACL that any further inshore expansion of the Tasmanian salmonid industry (including the Tassal Okehampton Bay proposal) should be “suspended” until such time as this critically important FRDC project is completed and the recommendations from the project have been properly adopted within the broader framework of finfish farming regulation in Tasmanian waters. This suspension should apply to all new inshore salmonid farm sites currently proposed (or in the planning phase) by any or all of Tasmania’s Salmon farming companies.

In the meantime, the Salmon companies should be encouraged by the Tasmanian Government to seek additional cost and production efficiencies within the existing scale of their operations. Additionally, they could also be encouraged to expand their production volumes by constructing on-shore closed-cycle farming systems as these are now considered *world’s best practice* in the context of environmental outcomes. Alternatively, they should investigate and trial off-shore farming systems that are at least 4 nautical miles from productive inshore reef systems.

Dean Lisson: TACL Chief Executive

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