

Consultation Summary Report

Draft Tasmanian Salmon Industry Plan



Author:
Department of Natural Resources and Environment Tasmania

Publisher:
Department of Natural Resources and Environment Tasmania

ISBN:
978-1-74380-168-0

Date:
May 2023

© Crown in Right of the State of Tasmania May 2023



Contents

Consultation Process	4
Community Briefing Sessions	4
COVID considerations	5
Session overview	5
Summary of key insights	5
Location specific themes	7
Feedback	9
Web-based submissions	10
Assessment of Submissions	10
Stakeholders.....	13



Consultation Process

From 23 November 2022, members of the public were invited to have their say on the [Draft Tasmanian Salmon Industry Plan](#) (Draft Plan), with submissions closing 20 January 2023.

The following supporting documents were also released with the Draft Plan:

- [Draft Tasmanian Salmon Industry Plan – Draft Workplan](#)
- [Have your Say Information Pack](#)
- [Plan on a Page – Draft Tasmanian Salmon Industry Plan](#)
- [Consultation Summary Report: Discussion Paper: Towards a 10-Year Salmon Plan](#)

Web-based submissions were invited during this period and community briefing sessions were held around the state.

Community Briefing Sessions

The purpose of these sessions was to provide information on the Draft Plan, for participants to ask questions about the Draft Plan, and to help participants understand the process for submitting feedback.

Community briefing sessions were held in the following locations, with approximately 390 people attending.

- Hobart - 5 December 2022, 5pm - 6:30pm at Old Woolstore
- Launceston - 9 December 2022, 12pm - 1:30pm at Prospect Government Office
- Devonport - 12 December 2022, 12pm - 1:30pm at Paranapple Centre
- Wynyard - 12 December 2022, 4pm - 5:30pm - Railway Institute Hall
- Strahan - 13 December 2022, 5pm - 6:30pm at Risby Cove
- Nubeena - 15 December 2022, 12pm - 1:30pm at Tasman Civic Centre
- Online - 15 December 2022, 5pm - 6:30pm via Microsoft Teams
- Huonville - 16 December 2022, 1:30pm - 3pm at Huonville Town Hall
- Flinders Island - 10 January 2023, 5pm - 6:30pm at Flinders Arts & Entertainment Centre
- King Island - 12 January 2023, 5pm - 6:30pm at Council Chambers

Presenters from NRE Tas included the Deputy Secretary Primary Industries and Water, General Manager Marine Resources and Senior Project Managers.



COVID considerations

On 25 November 2022, the COVID status in Tasmania was raised to moderate. Every effort was made to make the sessions COVID-safe, including providing masks and hand sanitiser, displaying COVID safe behaviour signs, encouraging those who are unwell to stay at home and attend the online session, and complying with venue capacity limits. Interested stakeholders were asked to register their attendance so NRE Tas could monitor attendance in line with venue capacity and for further communication if needed.

Session overview

Each 90-minute session provided context on the development of the Draft Plan, and then provided an overview of the Draft Plan and related Draft Workplan. Approximately an hour was reserved for a question-and-answer session. A feedback activity closed out the session, where participants were asked to voluntarily provide feedback to help NRE Tas evaluate the format of the sessions and to provide feedback for future engagements.

Summary of key insights

Factual notes were taken at each session. Below are key insights from across the ten sessions.

1. Many questions related to salmon farming generally, rather than specific questions on the Draft Plan.
2. Many questions were raised about foreign ownership of Tasmanian salmon aquaculture companies and concerns around process and regulation.
3. Many questions were asked around planning, particularly salmon farm locations, removal of salmon farms (particularly in near shore environments and Macquarie Harbour); and/or the Bass Strait.
4. Many questions were related to compliance, enforcement and independence of the EPA Tasmania.
5. Many questions and comments related to impacts on the environment.
6. Many statements were expressed about negative community sentiment towards salmon farming.
7. Some questions were asked about scientific research and research independence.
8. Several participants advocated for the removal of salmon farms from all Tasmanian waterways, onto land.
9. Several participants expressed frustration that they do not believe their concerns and/or previous submissions are being listened to.
10. Several participants expressed frustration at the timing of the consultation period.



Table I shows the topics raised across the ten sessions.

Regulation	Planning	Wildlife
<ul style="list-style-type: none"> • Trust • Transparency • Independence • Resourcing, effectiveness and independence of the EPA 	<ul style="list-style-type: none"> • Removal of pens from shallow, inshore locations • Decommissioning • Planning processes • Mapping of current and future farming • Location-specific planning – Bass Strait, Flinders Island, King Island, Commonwealth waters and south-east 	<ul style="list-style-type: none"> • Animal welfare • Wildlife interactions • Threatened species
Future growth	Environment	Community
<ul style="list-style-type: none"> • Recirculating Aquaculture Systems (RAS) • Land based farming • Offshore farming • Definition of offshore • Bass Strait development 	<ul style="list-style-type: none"> • Impact on environment • Marine debris • Antibiotic use • Freshwater use and water quality • Climate change • Remediation • Microplastics 	<ul style="list-style-type: none"> • Social licence • Impact on communities • Return to community • Representation in decision making • Community sentiment
Communications	Research	Economic
<ul style="list-style-type: none"> • Community consultation • Aboriginal consultation • Youth engagement • Regional consultation • Data and accessibility 	<ul style="list-style-type: none"> • Science-based decision making • Independence and funding sources • Citizen science 	<ul style="list-style-type: none"> • Full cost recovery • Licence fees • Return to community
Draft Plan	Workforce	Governance
<ul style="list-style-type: none"> • Detail and timeframes • Consultation period 	<ul style="list-style-type: none"> • Attraction and retention of staff in regional areas 	<ul style="list-style-type: none"> • Foreign ownership



Location specific themes

In conjunction with the summary of key insights, below are the themes specifically raised at each location. In most instances, the NRE Tas staff were able to respond to the questions raised through these sessions.

Hobart (~50 participants)

- Questions were raised about foreign ownership of the salmon industry in Tasmania.
- Questions relating to planning were raised, including moving leases out of inshore areas, moving inshore hatcheries to RAS, and moving salmon farms out of Macquarie Harbour.
- Concerns were raised about independent scientific research, environmental impacts, antibiotic use and relationships with communities.

Launceston (8 participants)

- Some comments were made regarding concerns relating to environmental impacts such as marine debris, algal blooms and antibiotics.
- Some comments were made about moving the industry onto land, better transparency and social licence.
- Some clarifying questions were asked about the timeframe from transitioning hatcheries to Reticulated Aquaculture Systems and full cost recovery.

Devonport (~40 participants)

- Many questions and concerns were raised on the suitability of the Bass Strait for salmon farming, with many participants voicing opposition to salmon farming in the Bass Strait.
- Some questions were asked around community's views on salmon farming and community involvement in decision making.
- Some clarifying questions about the Draft Plan were asked, including on topics relating to animal welfare, decommissioning and full cost recovery.

Wynyard (~90 participants)

- Many questions and concerns were raised on the suitability of the Bass Strait for salmon farming, with many participants voicing opposition to salmon farming in the Bass Strait.
- Some comments were made about how government can engage with Aboriginal elders and young people in the area.
- Some comments noted a distrust in both government and the salmon industry.
- Some concerns were raised on public safety from a navigation and waterway health perspective.



Strahan (5 participants)

- Many comments conveyed the difficulty in attracting and keeping industry staff in regional areas.
- Some comments focused on the Strahan Aquaculture Community Forum and the benefit of community and industry meeting regularly and directly.

Nubeena (~55 participants)

- Some concerns were raised about moving or reducing nearshore leases.
- Requests were made for further definition of 'south-east Tasmania', including maps displaying future areas for salmon farming.
- Some questions were asked about the timeframes for commitments made in the Plan.
- Many questions related to the theme of community, including jobs, where profits are invested, how community members could be involved in decision making, and community sentiment towards salmon farming.
- Many comments conveyed a lack of trust in both government and the salmon industry.

Online (~17 participants)

- Most questions and concerns raised related to the environment, including pollution, microplastics, freshwater.
- Some comments were made regarding the consultation timeframe.
- Some clarifying questions on the Draft Plan included full cost recovery and return to the community.

Huonville (~30 participants)

- Many questions were raised regarding full cost recovery, including clarifying what potential costs could be included, cost of developing the new Salmon Plan and cost of licence fees.
- Some questions related to planning were asked, including moving inshore leases, the east coast and planning processes.
- Some clarifying questions were asked about full cost recovery, licence fees and infectious diseases.



Flinders Island (~70 participants)

- Significant interest was expressed in the community being involved in a review of the *Furneaux Islands Marine Farm Development Plan 1999*.
- Many participants expressed concern about potential salmon farming on Flinders Island, with salmon farming more generally and potentially in Bass Strait.
- Some clarifying questions were asked about compliance, lease timeframes, scientific research and offshore policy.
- Some concerns were raised on salmon farming's potential impact on tourism, the coastal environment and cultural values.

King Island (~25 participants)

- Some questions related to Government's role and strength in regulating the industry.
- Some clarifying questions were asked about what is included in the Draft Plan, including antibiotics, fish feed, preventative action and a definition of offshore.
- Some questions were asked about loss of amenity and return to the community.
- Some comments and questions related to King Island's suitability for salmon farming and the potential impact salmon farming could have on the environment.

Feedback

At the end of each session, participants were asked to provide feedback on the session and future sessions. Questions asked included: whether they felt more informed about the Draft Plan, if they would be interested in attending future community engagement forums in the next 12 months, what topics they want to hear more about, and what the format of future forums could look like.

From the approximately 390 participants, 64 responses were received (17 per cent). Of these:

- 15 per cent said they felt more informed about the Draft Plan
- 42 per cent said they felt somewhat more informed about the Draft Plan
- 57 per cent said they didn't feel more informed about the Draft Plan
- 70 per cent said they would be interested in attending future community engagement forums over the next 12 months.

All topics presented in the survey (biosecurity, operational management, freshwater hatcheries, wildlife interaction, planning framework and emerging technology) were of interest to participants for future sessions, with the most popular topics environmental effects and management; followed by science to inform decision making. Additional topics of interest raised included animal welfare, remedial work, compliance and social license, benefit to the community (economic and social) and marine safety in relation to debris.



The format people would like to most see in future to share information related to salmon farming, aquaculture and broader marine resource management was regional public meetings, followed by science presentations by experts. Other suggested engagement formats included a formal citizen group, the presence of politicians, and one on one factual research with locals.

Web-based submissions

A total of 939 submissions were received between 23 November 2022 and 20 January 2023 inclusive. Feedback from four individuals/organisations were received after the consultation period closed.

Assessment of Submissions

All submissions received were reviewed by NRE Tas.

NRE Tas considered whether the submission was a statement; or whether it provided feedback on the Draft Plan and/or proposed Priority Outcomes and Strategic Pathways. If the submission was a statement, it was reviewed to see if it could inform policy principles or materially contribute to the Draft Plan.

The Draft Workplan was released as a supporting document to demonstrate to the community Government's commitment to actions, including those committed to through its response to the Legislative Council's Inquiry into Finfish Farming in Tasmania. If a submission contained feedback and/or proposed actions of relevance to the Plan, these were noted for the Department's consideration in future implementation planning.

If a submission raised a specific issue, such as reports of marine debris, these were raised with the relevant branch or authority for further investigation.

It should be noted that submissions have been provided by stakeholders and have not necessarily been endorsed by NRE Tas.



Breakdown of submissions and Government response

- Approximately 18 per cent of submissions were either a pro-forma email or contained modified content based on this proforma. The central focus of these submissions were the following five recommendations:
 1. *“Reinstate moratorium on new salmon leases: this must mean no new leases, no more biomass, no expansion of current leases and no swapping of zombie leases for new ones.*
 2. *Fully implement all 68 recommendations of the Legislative Council salmon inquiry report. Urgent attention paid to Recommendation 3 – 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.*
 3. *Start transitioning to land-based RAS (Recirculating Aquaculture System) salmon farming. Principle 2 of the Draft Tasmanian Salmon Industry Plan states “Innovation – future growth lies in land-based and offshore salmon farming” but there is no clear time-bound plan outlined. This must include transition of flow-through hatcheries to fully enclosed RAS hatcheries.*
 4. *Community voice in marine planning decisions, including Traditional Owners of Tasmania, through a process of Co-design as in Victoria, and that upholds UN Declaration on the Rights of Indigenous People (UNDRIP) by obtaining free, prior and informed consent (FPIC).*
 5. *Radical reform of Tasmania’s marine planning process, marine laws and Environment Protection Authority (EPA); Tasmanian government to put in place a holistic Marine Plan, a stronger new marine law prioritising healthy ocean ecosystems and a truly independent EPA.”*

Government has considered these submissions and notes the following:

- Four principles were established to guide the development of a new Plan. With Principle 1 being ‘no net increase in total leasable area for finfish farming in Tasmanian state waters’ – a 12-month moratorium was in place and expired on 15 September 2022. This principle remained in place whilst the new Plan was being finalised. The new Plan provides parameters around the Government’s support of existing and future farming, and their regulation.
- The Government’s response to the Legislative Council Report on Finfish Farming (released on 16 August 2022) noted actions that were supported, supported in principle or not supported. The Implementation Program reflects all actions Government has committed to in its response to this Inquiry.
- Consideration of community voice in marine planning decisions and a reform of Tasmania’s marine planning processes will be considered in the review of the *Living Marine Resources Management Act 1995* and the *Marine Farming Planning Act 1995*. Additionally, the Implementation Program includes actions to deliver community engagement forums and to engage Tasmanian Aboriginal community.



The Government's Implementation Program includes the following relevant actions:

- develop Freshwater Finfish Farming Standards and establish a framework to support the transition of existing flow through systems to RAS.
- development, finalise and commence implementation of Salmonid Biosecurity Program, standardised Marine Farming Management Controls, Marine and Freshwater Finfish Farming Environmental Standards, and Wildlife Interaction Standards.
- progress the development of the Tasmanian Marine Atlas in partnership with IMAS and FRDC.
- support Blue Economy CRC led Marine Spatial Planning Project to underpin future offshore development planning at the national scale.
- develop a Tasmanian Aquaculture Development Strategy to guide broader sea use policy.

• Approximately 40 per cent of submissions reflected a specific focus on seal management concerns, a majority originating from the mainland based on provided locality data.

Feedback raised in these were related to:

- protection of seals
- concern for the use of seal deterrents
- introduction of wildlife interaction standards
- animal welfare concerns

Government has considered these submissions and notes that the Plan's Implementation Program includes the following relevant actions:

- update the Seal Management Framework and Minimum Standard Requirements.
- develop and implement new Wildlife Interaction Standards that addresses potential interactions that occur with a range of marine wildlife species with measures to minimise risk to the health and safety of animals and farmworkers.
- undertake compliance and enforcement activities in line with the implementation of the Seal Management Framework and Minimum Requirements until it is superseded with the new Wildlife Interaction Standard.



-
- Approximately one per cent of submissions were received from the salmon industry or supply chain business. Feedback raised in these related to:
 - importance of the salmon industry for jobs
 - importance of the salmon industry for supporting Tasmanian communities
 - investment and business certainty
 - evidence based decision making
 - vaccine development
 - Government-industry engagement through formal group
 - regulatory framework
 - research partnerships

Government has considered these submissions and notes their alignment to the intent of Priority Outcome 1: Sustainable industry and Priority Outcome 3: Prosperous communities.

-
- Approximately 30 per cent of submissions (which were not related to the submissions noted above) were general statements of support or non-support for the industry and/or the Draft Plan. A number of these submissions, from the same individual or organisation, were also submitted multiple times.

Government has considered these submissions in finalising the Plan.

-
- Approximately nine per cent of submissions provided direct feedback on the Draft Plan.

Government has considered these submissions and notes that many contained topics or actions previously through the feedback received on the Discussion Paper. Feedback from these submissions were assessed to see if they could make further material changes to the Plan.

Stakeholders

Submissions received from interested stakeholder fell into these broad categories:

- Aquaculture and fishery industry associations
- Commerce and business groups
- Community and NRM groups
- Consumer outlets
- Individuals
- Industry companies and businesses across the supply chain
- Industry workforce
- Local government
- Non-government organisations
- Other Tasmanian businesses
- Political groups or politicians
- Research institutes



Submissions by location

Location data was provided by 99 per cent of submitters.

Of those, approximately 50 per cent identified as from Tasmania.

The remaining submissions were either from mainland Australia (48 per cent); or had no location data, were from overseas, or the post code was not recognised (two per cent).

Publication of submissions

All submissions have been published in accordance with Tasmanian Government's *Public Submissions Policy*.

All submissions can be accessed at nre.tas.gov.au/salmonplan.

Note: 80 submissions requested full or partial confidentiality, and in accordance with the Policy above have been assessed but not published.



