

SUBMISSION 1 – Susan Cowgill

Thank you for the opportunity to comment on the Draft Environmental Standards.

General comments and observations....

Two of the main problems with the salmon industry as I see it are the lack of transparency and lack of regulation. Sure, there are lots of regulations, but they don't appear to be enforced. Many things are optional and discretionary, with the industry given the benefit of the doubt. These Draft Environmental Standards seem to be pretty much business as usual.

The EPA Director has been charged with making many discretionary determinations. The thresholds as to when and why these decisions are made require greater clarity. All determinations by the Director, and the reasons for such, should be made public. This would improve public perception of the independence of the EPA. If government and industry truly want to improve the public understanding and in the interest of transparency, all information should be available to the public in a timely manner. This should include all Baseline Environmental Assessment data and Modelling and Mapping and Monitoring information. Commercial In-confidence excuses should not be a legitimate barrier to release of information.

Why has a new "zone" been created? This is completely unnecessary, and a hugely negative step for the environment. Call it whatever you may, the addition of the "Dispersal Zone" is nothing more than a widening of the AZE an extra 100 metres! The depositional and dispersal zones should be scrapped.

It is incredulous that an Environmental Standard is based around the term "significant", which has not been defined! The term "significant" should be removed from the document. An undefinable term makes the complete document worthless. **If there are "significant" effects outside the farm zone, the environmental management has already failed.** It is completely unsatisfactory that the Standards allow waste to have a slightly less than significant impact on the health and biodiversity of the benthic ecosystem in the dispersal zone. It is completely unsatisfactory that the Standards allow waste to almost significantly alter reef and sea grass communities in the regional zone. There should be **NO** observable effects outside the lease area.

Remedial action to destock or fallow should be taken immediately, not "as soon as practicable".

The use of Therapeutants needs to be made public with ample warning prior to administration, with ongoing warnings during post administration monitoring.

Pens only one metre off the sea floor is far from best practice. Pens that are half the water depth are best practice. This allows for optimal nutrient dispersal.

Will the EPA be adequately resourced? Statements like "monitoring where it is needed most" implies that all necessary monitoring will not occur!

No mention of the ongoing plastic pollution and potentially deadly problem of marine debris! Has the farcical "Zero Tolerance" ideal been scrapped?

And what of penalties? Will we finally have an industry that is made to be accountable to Tasmanians and the environment, with penalties that are enforced and act as a legitimate deterrent and are not just a cost of doing business?

Susan Cowgill