

SUBMISSION 12 – Cherrie Consulting

Submission on the Salmon Standard

As a former member of the Marine Farming Review Panel, I called for a salmon standard to hold operators equally accountable to high standards of environmental protection and to create an even playing field for investment. In the ensuing 5 years there has been little traction. The released documents for consultation are grossly inadequate, with the main issues being the absence of technical details, the absence of trigger limits, the continued over-reliance on visual indicators, and the application of Directors discretion instead of specificity. Based on the inadequacy of what has been provided I am only able to provide the following comments:

- **Technical detail is absent** therefore preventing specialists from commenting. This is not a standard.
- There are **no trigger values** and **no operational actions defined** for those trigger values. Again, this is not a standard.
- There are no sociocultural or non-salmon farming economic considerations in the Baseline Environmental Assessment. Without this how do you know what is at risk?
- The standard still has an **over-reliance on visual indicators** e.g. Division 4 Seabed where spontaneous gas bubbling should result in fallowing of the pen as soon as reasonably practicable (and as we all know, this will be at the end of the production cycle). This allows for harm to continue to occur until harvest, as was the case in Macquarie Harbour where no fish were removed from a massively polluting cage until 8 months after severe visual impact was evident. This is unacceptable and NOT adaptive management. Dispersal and regional zone impacts are also highly reliant upon visual assessment not physiochemical parameters. Visual indicators are a symptom and, by the time an impact is visually evident, a farm has been releasing nutrients above attenuable limits for a long period. The standard continues to miss the point!
- The draft is **peppered with Director discretion** but the EPA has a history of not utilising available powers and it is nonsensical to place the Director in the position where they have to use discretionary powers.
- The “Peak period” for production is defined by planned feed as advised by the operators. This is loose and open to under-reporting. Peak period should be defined by ACTUAL feed, stocking density and biomass.
- There is no requirement for Public Environmental Reports as are comment for high impact industries. How does DRET proposed to build trust and transparency without public reporting?
- Division 5 – Waste Management Plan should be supplied PRIOR to commencement not within 60 days of operation. This does not align with standards applied to other sectors such as mining and breaches the State Policy for Water Quality Management.
- All plastic items used on farm should be specified, tracked and contained.
- The definition of Mass Mortalities should be more specific than “significantly above typical range”. What is typical?
- Part 4 – Baseline environmental assessments only apply to new leases and is exempt in emergency situations. There are no provisions in the standard that deal with existing lease areas and the slow degradation of waterways.
- Division 2 – The selection of monitoring stations does not require maps and plans to identify and mark sensitive receptors.
- Biogeochemical modelling is not mandatory and this is blatantly inadequate.
- BEMP provisions are not defined to the level where I can comment. Where a BEMP is required for a region there is no information on cost apportionment not any compulsion to

share costs or collaborate with others within that region. Who pays? How much do they contribute? Who conducts the monitoring?

- BEMP should be designed by an independent scientific body and assessed and approved by a scientific panel NOT the Director.
- 5-year reviews of BEMP data are by a “recognised scientific research organisation approved by the Director”. Trust in independence has been eroded and this is not adequate. The BEMP data reviews should be published and available in a similar manner to the Derwent Estuary Program reports.
- Division 6 – Therapeutant residue monitoring is not well specified.
- The standard states that benchmarking will be established by the Director. Benchmarking IS the standard and should be against best practice environmental management, not against open pen salmon farming that is increasingly being outlawed in other countries.
- Division 8 – Light attenuation and Division 9 – Noise are both highly reactive not pro-active. Only after notice to the Director are light attenuation and noise management plans required. The standard should specify light and noise so that these can be designed for, as is the case with ANY OTHER DEVELOPMENT IN TASMANIA. Waiting for a complaint is poor management and even poorer regulation.
- Division 9 – Noise should require a survey of sensitive noise receptors prior to operation. Harmonics and infrasound are not addressed at all, and these are cause for significant nuisance.

Highly disappointed that, after 5 years this is all that has been developed. On a positive note the font was quite nice.

Regards

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