

SUBMISSION 2 – Chris Wells

Thank you for the opportunity to make this submission.

There are a number of areas in the draft environmental standards that need comment and I will make suggestions referencing the appropriate areas needing clarification later in this submission. The most glaring deficiency in the draft paper is broader than a word here or a definition change there. The most glaring deficiency is the complete lack of acknowledgment by the authors in describing the reason for the new environmental standards in the first place. That is, for thirty years or more existing licence holders have been polluting shallow inshore areas by overstocking, overfeeding and generally vandalising precious inshore coastal areas. The document makes no mention of removing licences from existing shallow water lease areas or from closing these areas and worse makes it clear that even these new environmental standards allow for a transition period before *new* lease holders need address the requirements of the new standards. The document describes a new future of salmon farming that does begin to address the poor environmental impacts of intensive finfish farming but does not solve any of the current problems of the existing industry. The future then looks rather grim, advantaging current lease and licence holders and dissuading new entrants to the marketplace. In the same vein, the authors suggest that the Director of the EPA 'may' require information from lease holders pertaining to environmental conditions and breaches. This kind of regulatory regime leaves the reader wondering what may happen if the EPA board or the Minister recommend to the Director that no additional information is required from salmon farmers and the result will then be salmon business as usual. In other words, the next thirty years of farming will be handled possibly as badly as the first thirty years due to a succession of Ministers who remain completely unmoved or oblivious to the ruin of shallow inshore marine environments. In the meantime, existing bureaucrats have pushed the problem from their desks. Business as usual remaining dirty business as usual.

The document needs to be more strongly worded to minimise Ministerial or board meddling for either 'job creation' purposes or unthinking regional economic development ideology. The document needs to describe what happens to existing shallow water farms and put an end date to these. As the introduction of these standards basically means these existing farms would not meet the terms of the conditions being proposed.

The most important reform is to define an end date to existing inshore shallow water leases and to ensure any intensive finfish farming occurs in waters of twenty-five metres of depth or more. The document needs to describe a minimum depth for intensive finfish farms as it does suggest a minimum depth beneath cages. I recommend a minimum depth of twenty five metres. Any aquaculture farm in less than twenty-five metres is only suited to shellfish or seaweed production. The document should define *offshore* finfish farming as that aquaculture occurring in Commonwealth waters.

The following addresses the paper page by page:

Page 8 Determine a regional area

Suggest – The Director will determine a regional area.

Page 8 Baseline Regional Assessment

In the case of existing lease areas under twenty five metres deep the Director will choose and monitor a site similar to the existing lease and from an assessment over a two year period compare this with activity on the existing lease site. From that time the new standards apply. Or if the existing

lease holder is not comfortable with the new standards the lease can be closed and a new lease area negotiated.

Page 9 as above

Page 10 Mapping and Monitoring Stations

1. A holder of any lease must-

Page 12 BEMP

The Director will provide a notice to the holder of any intensive fish farm lease a notice specifying the BEMP that is to apply.

P13 division four seabed

This section refers to all leaseholders of intensive finfish farms.(not new)

Page 14 Dispersal zone

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 15

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 15 This section refers to all leaseholders of intensive finfish farms
(not new)

Page 16 Division 5

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 16TPDNO

1. The Director will...
2. Will not
3. Will not

Page 17 Division 6

This section refers to all leaseholders of intensive finfish farms
(not just new)

Page 18 Wastewater Management

This section refers to all leaseholders of intensive finfish farms
(not just new)

Page 19 Division 9

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 20 Nuisance investigation

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 21 division 10

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 22 Part 5

This section refers to all leaseholders of intensive finfish farms
(not new)

Requirements ;

1. A licence holder must undertake a BEA in accordance with an agreed technical standard B) plus any additional requirements as specified by the Director

4) The baseline environmental assessment **must** include the following
(drop the bit about the director it is too weak)

Page 23 Division 2 Finfish Pens

Finfish Pens condition

The licence holder must ensure finfish pen nets are at least five metres clear of the seabed at low tide. Or, the depth below the net should be deeper than the net depth.

Division 3 Seabed monitoring.

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 24 Division 4

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 25 waste management plan

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 26 Noise

This section refers to all leaseholders of intensive finfish farms
(not new)

Page 28 Division 7 finfish mortality

This section refers to all leaseholders of intensive finfish farms
(not new)

In summary then please include existing lease and licence holders in the plan and move them to deeper waters as soon as possible. Existing shallow water leases must be closed by 2025

Thirty year leases are irresponsible. No intensive finfish farms should occur in waters of less than twenty five metres. Depth below cages should exceed net depth.

The new regulatory regime will mean nothing without enforcement. Employ enforcement officers to apply the new conditions.

Thanks again for the opportunity to comment.

Chris Wells

Feb 2023