5 March 2023

The Consultation Manager
Draft Environmental Standards for Tasmanian Marine Finfish Farming 2023
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Finfish Environmental Standards Consultation

Please find below my response to the recently released Draft Environmental Standards document
I trust that you find my feedback useful and constructive and look forward to further engagement opportunities

1 Baseline Monitoring – Existing Leases

It appears as if baseline surveys, and appropriate monitoring are not required for existing leases and/or permits. If this is the case I think it is a serious shortcoming because of the problems that have been historically reported for existing fish farms and the associated deterioration in the level of public trust over the environmental management of those operations.

A common sense approach would be to

- Establish appropriate reference sites outside the impact zone of the existing operations
- Establish the existing environmental condition within the existing operational impact zone
- Develop an Environmental Management Plan that returns impact zone environmental condition to that existing at the reference sites
- Maintain this new baseline condition thereafter

2 Finfish Pens

It seems to me that the minimum seabed clearance for finfish pens should be much greater than 1 metre.

I suggest that the governing factor here will always be the provision of sufficient oxygenated water mass flow through the organically loaded zone within and below the pens to ensure proper water circulation, oxygenation, and waste dispersion. The aim is to prevent accumulation of uneaten feed, faeces, and other organic matter that can lead to the depletion of oxygen in the water and the growth of harmful bacteria and parasites – all problems that have been reported within the Tasmanian salmon industry.

Setting a generic minimum seabed clearance is problematic because each marine Farm Zone will be uniquely characterised by its stocking rate, organic load, water exchange rates and

reference site environmental conditions. Whilst some jurisdictions have recommended clearances of between 4 and 10 metres, minimum clearances should therefore be established for each Farm Zone.

An additional practical clearance concern relates to tidal rise and fall, and the need to keep nets well clear of the seabed at low tide. Wave conditions experienced at the site can further reduce minimum clearances. It is recommended that minimum clearances refer to Lowest Astronomical Tides (LAT) experienced at the Farm Zone as these are lower than mean low water (MLW) levels and mean low water springs (MLWS) levels. It is also recommended that the average significant wave height be determined for individual Farm Zones and added to minimum tidal clearances.

Having said this it is unlikely that tidal and wave determinants would result in a minimum clearance greater than that required for oxygenated water mass flow.

End of Submission