

1. Introduction

The Tasmanian Salmonid Growers Association (TSGA) is the strong and united peak body representing the salmon industry in the state. On behalf of the Tasmanian salmon industry, the TSGA is pleased to provide this submission to the public consultation phase of the development of a Draft Biosecurity Standard.

The Tasmanian salmon industry contributed over \$1 billion annually in direct value to the Tasmanian economy, the highest value food product¹. The industry spends approximately \$500 million on local Tasmanian suppliers each year - these suppliers are a critical part of Tasmanian manufacturing, transport and ag-tech industries. The industry is one of the leading employment opportunities for regional Tasmanians with about 2,000 direct employees and over 10,000 indirect. Our workforce includes world leaders and we are considered best in class across IT, precision farming, safety, marine science, aquaculture, animal husbandry and engineering, with many coming from Tasmanian training and education pathways.

We are no different to any Australian farmer. We care for our stock, the environment, our workforce, and the communities we work in.

Salmon farming is a highly regulated and ethical practice. Farmed salmon is the global leader in feed conversion ratios for animal protein production. Farmed salmon has one of the lowest climate footprints of all animal protein sources². Aquaculture is an eco-efficient alternate to terrestrial meat and is an integral part of Australia's sustainable food systems.

Globally, with increasing pressures on our planet access to arable land is becoming more constrained and with wild fisheries plateauing from protecting vulnerable stocks at sustainable levels, a key aspect to the future of the world's food and protein supply is aquaculture.

Aquaculture Standards

While the Tasmanian salmon industry is broadly supportive of Tasmanian Government aquaculture standards for marine farming activities to ensure consistency and consolidation of existing management, it has significant concerns with the current approach to their development and introduction to the community. This is also confused with the degree to which standards relate to broader marine farming activities and the 10 Year Salmon Plan.

The standards are a "left over" action from the 2017 Salmon Growth Plan and this delay in their finalisation has contributed to the general misconception that the salmon industry is currently not well regulated. The reality is that a combination of existing regulatory and voluntary measures has been implemented by industry to protect fish health, the environment and biosecurity. These are not only key from a business perspective but to enable the ongoing and sustainable operation of the industry.

The community is looking to the State Government for reassurance regarding the narrative about the operation of the Tasmanian salmon industry. This is why messaging and factual accuracy of the draft standards, including adequately capturing the current practices and regulation is critically important.

By developing standards in isolation, the Tasmanian Government has become solely responsible for accurately portraying the salmon industry and its operations, without opportunity for industry to sanity check this information. This has resulted in misrepresentation of the industry and its practices. One pertinent example of this is the use of outdated images and inappropriate coloured filters in the

¹. [Tasmanian Agri-Food Score Card, 2019-20](#)

². [Tassal Sustainability Report, 2021](#)

graphic design of documents - this may be perceived as trivial but is contributing to the representation of the industry by government. Significantly, all three aquaculture standards have a tone and content implying that prior to the development of the draft standards, the industry has been operating in a vacuum of appropriate regulation, policy, and consistency.

There is much to be improved in the next steps of finalising Aquaculture Standards and the industry looks forward to working with the Tasmanian Government to develop:

- Clear context and explanations that Aquaculture Standards are not part of the 10 Year Salmon Plan thereby allowing the latter to be a visionary document, rather than focusing on regulatory reform.
- Clarification of the role of each of the Standards recognising they are at different stages, ie the Environment Standard is dependent on the amendment of the Environmental Management and Pollution Control Act 1994 (EMPCA) as a first and separate step.
- An agreed partnership approach to ensure applicable standards are developed for industry, necessary to maximise outcomes.
- A strong understanding of industry reflected in an accurate portrayal throughout the Standards and any supporting documents.
- Future communications that include information on how relevant Standards will be implemented in other aquaculture industries, or indeed any EPA regulated premise.
- A forum to develop a process for the finalisation, implementation and review of Standards, relevant to individual standards but may include an independent voice eg a Chief Scientist, Natural Resources Commission as in NSW.

Draft Biosecurity Standards

This general lack of a partnership approach in the development of aquaculture standards is particularly ironic in the publication of a biosecurity program for the Tasmanian salmon industry, given the industry developed a joint biosecurity plan over four years ago. Following revision and consultation with government, a biosecurity blueprint was presented to government back in early 2019.

While its review and adoption were delayed with the introduction of the Biosecurity Act 2019, the industry has continued to implement biosecurity measures in its freshwater and marine operations. These have been vital for meeting general biosecurity objectives of preventing, eliminating or minimising risks posed by infectious diseases of salmon and associated aquatic pests.

Like any farmer the industry adopts the philosophy that prevention is better than cure. Disease control in aquaculture production requires a holistic approach. Good site management, animal husbandry and rigorous biosecurity measures are central to reducing the risk of disease outbreaks and controlling the spread of disease. Biosecurity is especially important in the hatchery environment as un-vaccinated fish are more vulnerable to diseases and pathogens.

The salmon industry co-funds fish health surveillance and vaccine development programs with the Tasmanian Government. It is one of the few primary industries in the state coordinating a preventative surveillance monitoring program, which is co-funded upfront to ensure laboratory capacity is maintained in the state.

For the industry, biosecurity measures are not only important for a strong and robust business but are also vital for providing fish health and welfare outcomes.

The Tasmanian Salmon industry looks forward to working with the Tasmanian Government to include an accurate background to the industry, history of its biosecurity management, and quantification of potential increased costs to industry, within the final versions of the three draft consultation documents.

2. Salmon Biosecurity Standard

2.1 Draft Biosecurity (Salmonid Biosecurity Zones) Regulations 2022

The Tasmanian salmon industry has no specific comments to make on the draft regulations, apart from noting the inclusion of a regulation authorising specific acts for the purpose of Part VI of the Competition and Consumer Act 2010, which is necessary to enable implementation of a number of the proposed Biosecurity Standards.

2.2 Draft Biosecurity (Salmonid Biosecurity Zones) Regulations 2022: Regulatory Impact Statement

The tone and content of the Regulatory Impact Statement does not accurately reflect the industry's understanding of biosecurity, including its importance in the sustainable development of our sector. Nor does it accurately portray the history of the program's development and industry's continued focus on implementing biosecurity measures.

Executive summary

Dot point 3: There should be recognition that the salmonid industry already works together on industry-wide biosecurity and disease management issues, as discussed in the section

Dot point 8: We disagree that cost increases would be marginal.

At least one additional dot point should adequately address the history of the biosecurity Program and industry's proactive and voluntary role in managing biosecurity.

Page 4, Background 2.1 The Tasmanian Salmon Industry

While the introduction section broadly captures the operations and status of the industry, there are nuances that have been missed and the economic and social contribution of the Tasmanian salmon industry have not been explicitly covered. For example, the sector spends over \$500 million dollars on local businesses that provide supplies and services and are also integral in training and education and contributing to first class research and science in the state.

This section also needs to include a background on the development of a biosecurity program in Tasmania. The industry produced its own Biosecurity Plan and then submitted a "*Towards a Tasmanian Salmonid Finfish Biosecurity Plan 2018: Project Blueprint*" to government in early 2019. While progress in government was delayed with the development and introduction of the Biosecurity Act 2019, there has been a long history of an effective partnership in biosecurity management in the industry.

Page 5, Section 2.2: Statement of the problem

The fourth paragraph suggests that none of the specified activities have been enacted by the industry before their conception in these standards. This is not correct; industry has been working together on many matters and has a strong history of collaboration in health management and research and development specifically related to biosecurity

Page 7, White Spot Disease (WSD) and the Queensland Prawn Industry

Whilst the figures for 2016-17 may be correct, the statement above which is couched in current terms and refers to the contribution of the Logan River farms is not. The relative importance of the Logan River farms is reduced now, with the largest prawn farm in Australia at Proserpine producing almost 60% of the Australian production tonnage.

Page 8, POMS and the Tasmanian Oyster Industry

Similar to the previous example, there are statements relating to the impacts of POMS which are couched in current terms that may no longer be accurate. While *“mortality of up to 100% can be experienced in farmed oysters within days of infection”* was true in the first two years of POMS, the selective breeding program has reduced mortality significantly in recent years. It is also noted that while production decreased, the overall value of the industry has been consistent.

Page 8, Section 2.3: The regulatory model

The third paragraph suggests that the Tasmanian salmonid industry focussed its voluntary biosecurity effort only in the marine environment; this is not accurate as companies have active biosecurity measures throughout freshwater facilities too.

Page 17, Section 5.1: Benefits

The first paragraph suggests that diseases would not be recognised or communicated to government without these regulated standards. This is incorrect and does not reflect accurately the historical collaboration within industry for:

- the development of its own biosecurity plan,
- the co-development of area management agreements,
- revised and developed biosecurity blueprint to present to government,
- the development of the Joint Salmonid Industry Health Group,
- co-funding of diagnostic and surveillance program,
- co-funding of vaccine development program and infrastructure for the biosecurity fish facility,
- all diagnostic samples are processed through the government animal health lab, collocated with the office of the Chief Veterinary Officer

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In the fourth paragraph the author clearly states it is not possible to precisely determine where along the invasion curve options sit (noting this was compiled for invasive species management). It is also emphasised by industry that the RIS did not consider that prevention in an animal disease scenario may be achieved through other measures such as vaccination.

Since all companies have co-invested in vaccine development and all companies voluntarily utilise the vaccines developed, Option 1 has already placed the industry at the “prevention phase”. Companies also communicate with government (animal health lab) about the potential of emerging diseases and the development of vaccines which may be required in the future.

It is hard to accept that the concept of potential savings of hundreds of millions of dollars can be necessarily justified; with no data to support this position. This uncertainty needs to be balanced against the cost to the industry of regulating, which industry argues is considerably higher than the RIS has subjectively suggested.

Page 20, Section 5.3.1 Implementation and administration costs

Page 20, Section 5.3.3 Audit and verification costs

The industry strongly disputes that the implementation, planning, audit and verification costs for industry under Option 2 (to regulate) would be minor.

For example, one TSGA member company has calculated its annual costs to establish, implement, review, maintain and train staff in the use of a single accreditation program to be in the vicinity of \$250,000 plus audit costs.

All companies agree that additional staff would be required to manage the compliance system itself (not specifically the biosecurity measures) so as to ensure comprehensive evidence of compliance with regulated standards. Existing staff are also likely to require additional training to have the skill sets required to perform these internal audits. This simply adds production costs at a time when cost bases are increasing, and there is a desire to keep quality protein sources affordable for Australian households.

Page 22, Section 5.3.6: Consumer gains

It is unclear how the standards “support achieving public and consumer safety outcomes, particularly food safety.” Companies have existing and excellent traceability, comprehensive food safety and accreditation programs, and are audited regularly.

Page 25, Table 3: Comparison of options

While it is recognised that status quo would not necessarily deliver a robust regulatory framework that ensures all parties meet the same minimum level of standards; the industry developed a robust series of biosecurity measures in its blueprint with good intent. There is industry concern that costs are understated, and potential gains overstated in the RIS. Decision making on whether to regulate, or utilise other vehicles within the Biosecurity Act 2019, such as Industry Biosecurity Plans approved by the Minister, are more borderline and subjective.

2.3 Biosecurity Program: Tasmanian Salmonid Industry (Draft for Public Consultation)

The Tasmanian salmon industry provides the following comments on the Operating Standards contained in Draft 1.2 of the Biosecurity Program: Tasmanian Salmonid Industry (the Program).

In their current form, some of the operating standards represent a risk to the success of aspects of the Program, because they do not necessarily reflect an intimate knowledge of the industry. This means some operating standards are:

- not appropriate for application to industry activities.
- do not achieve the original or stated intention for certain biosecurity measures elaborated in the industry blueprint.
- too detailed, restrictive, or prescriptive instead of being objective focussed, and could instead be better written as more objective standard with more specific and explanatory guidelines.

2.3.1 Introduction section

Page 4: Section 1.1 Background

The Tasmanian salmon industry believes it’s important to recognise and accurately portray the sector in this section of the document. For example, the industry consists of and supports an extensive range of businesses including feed production, pen and net manufacturing, vessel manufacture, processing, transport and logistics, waste disposal, plastics recycling, cleaning, the retail sector and science, technology and education sectors. The industry spends \$500 million dollars annually on Tasmanian businesses and contributes a range of other benefits to the state, including an extensive education and training pathway for the workforce.

To be accurate, the background section should also include the history contributing to the development of the Program, as outlined above.

Page 4: Section 1.2 Objective:

“...and provides for reporting Standards that will enable rapid response to the detection of endemic, introduced, or new and emerging infectious diseases.”

It is important that the document accurately reflects the series of measures already implemented by industry and the willing engagement of industry to ensure this outcome. There is not a current vacuum in this area.

This section also needs to incorporate the sentence *“The application of the Program Standards also provides for fish health and welfare outcomes”* (Section 2.1, p 6), as it captures an importance objective of the Program.

Page 5: Section 1.3 Scope:

The third paragraph *“...the Program recognises that biosecurity in inland freshwater hatcheries must continue to be managed by the Inland Fisheries Service (IFS)”*, appears to rule out progression towards a single integrated biosecurity system. It is recommended it is rewritten as:

*“...the Program recognises that biosecurity in inland freshwater hatcheries must **currently** continue to be managed by the Inland Fisheries Service (IFS)”*.

2.3.2 Schedule 1: Marine Operations Standards

MOS 14. Detection of biosecurity events

MOS 14(b): *“any incidence of any known or unknown disease affecting greater than 0.25% of fish per day for three consecutive days in an individual pen or affecting more than 0.5% of fish in a single day in an individual pen.”*

It is the strong view of industry that this clause is removed from the standards.

This requirement cannot be implemented as it is specifically written. The definition of disease in relatable legislation means any organism reasonably expected to be present in a pen of fish would count, including the endemic organism AGD. The Animal Animal Health Act 1995 for example defines “disease: as:

- (a) a disease that affects or may affect an animal; and
- (b) a disease agent; and
- (c) a zoonosis;”

It is highly likely the AGD organism would be present on a number of fish in excess of 0.25% on any day, in any pen. This would result in industry notifying every pen every day to be sure of meeting the requirement. In addition, the global standard for freedom from disease is presence of a pathogen in a population of animals at less than 2%. The detection of disease at a design prevalence of 0.25% is impossible without absolutely perfect diagnostic tests, which do not exist.

It is understood that the underlying intent, which has been lost in this iteration, is to ensure coverage of Section 10(b) of the Biosecurity Act 2019, namely the reporting of “(b) the presence in Tasmania, or part of Tasmania, of an animal disease that may pose a biosecurity risk to Tasmania, or part of Tasmania, regardless of whether the disease, or cause of the disease, is known or identified:”

With respect to this duty to report potential biosecurity risks to the best of the industry’s ability, the clause MOS 14(e) *“any other incident, event or observation that, in the reasonable opinion of the salmonid producer, indicates that a biosecurity event has occurred or is likely to occur”* would cover the intent of MOS 14(b) and thus MOS 14(b) should be removed from the standards, as it is operationally redundant.

The wording of the alternative standard, MOS 14(b) clearly covers the pens that salmon are held in, and thus specifically refers to the farming companies. Given all the salmon farming companies have in-house veterinary expertise, there is a clear capacity to effectively judge whether an event or

observation may or does represent a biosecurity event and thus there is an obligation to report through MOS 14(e).

MOS 18. Fish Movement records

MOS 18(f)(i) should be rewritten to *“the relevant Inland Fisheries Service Transport Approval or Inland Fisheries Service Exemption Permit”*

The IFS issues exemptions to seeking transport approvals for every individual fish movement. Although copies of transport approvals may not be available a copy of the exemption will be held by the provider.

MOS 24. Separation of marine farming structures

MOS 24(2) speaks to the standard *“not applying in respect of an established marine farm”*. Similar to the level of derogation for freshwater facilities that have received approvals [i.e. FOS 20(2)], the standard should be rewritten to include:

- farms that have been fully or partially approved, but not yet operational and
- farms that have been in operation but are not operating at the time of the introduction of the standards.

This could be achieved by rewording the standard or the definition of an “established marine farm”, with alternative wording for this definition suggested later in this submission.

MOS 32. Movement of vessels to or from Western Salmonid Biosecurity Zone

It is proposed this standard is re-written as follows:

“A salmonid producer moving any vessel to or from the Western Marine Salmonid Biosecurity Zone must ensure that:

- (a) the vessel has a visibly clean hull before leaving the Zone; and*
- (b) any recommendations made by the Joint Salmonid Industry Health Group for vessels to be slipped for pressure washing before being used on any marine farm in another marine salmonid biosecurity zone are followed; and*
- (c) all vessels are otherwise cleaned and treated in order to prevent, eliminate or minimise so far as is reasonably practicable any biosecurity risk posed by the vessel before being moved from the Zone.”*

The wording ensures that the Joint Salmonid Industry Health Group can specify the level of measures to be taken, depending on the epidemiology situation in Tasmania to better protect the Macquarie Harbour ecosystem.

MOS 33. Well boats

Specifically with respect to MOS 33(b) it is recommended this clause is amended to read: *“more than four (4) kilometres distance from any boundary of another **salmonid** producer’s marine farm”*. This addresses the risk management intent that water used to bath salmon by one salmonid producer should not represent an increased risk to any other producer.

MOS 35. Movement of salmonid equipment

The words *“to and from”* in MOS 35(a) and MOS 35(b) should be replaced with *“between”* as items may be removed from marine farms for disposal, and do not necessarily represent a biosecurity risk.

In addition, the definition of *“used salmonid equipment”* is very broad, which is addressed in comments in relation to the glossary.

MOS 38. Treatment of equipment used to carry harvested fish or blood water

This standard is an example of a prescriptive and restrictive standard with MOS 38(b) requiring “..an effective treatment measure after each use”.

While food safety drives the treatment of containers of harvested fish, the removal of bloodwater by vacuum tankers may involve removing liquid at multiple sites and the tanker may not necessarily be cleaned between. It is emphasised that the biosecurity risk is negligible.

Recommended wording for this clause is: “*subject to effective treatment measures to prevent, eliminate, or minimise biosecurity risk posed by the equipment.*”

MOS 40. Certification of fish from freshwater facility to marine farm

MOS 40(1)(a) should be written “..the vaccination of the fish in accordance with **any** vaccination program endorsed...” rather than “a vaccination program”, as there may not necessarily be an endorsed vaccination program under certain circumstances. For example, where a vaccine does not yet exist for certain endemic pathogens. Or it has been shown that an endemic pathogen, or pathogens, present a lower risk to the animals than the process of vaccination.

This standard is not consistent with similar operating standards, such as MOS 39 in terms of objectivity, avoiding unnecessary prescription or reflecting industry practice. As written MOS 40 requires every tank or pond to be specifically laboratory tested. This penalises operators with many smaller tanks/ponds compared to fewer larger tanks/ponds, and does not recognise it is the population of fish representing a risk unit, rather than individual tanks/ponds in the same facility.

This standard should be re-written:

“MOS 40. Certification of fish from freshwater facility to marine farm

(1) A salmonid producer must ensure that no live fish or group of live fish from a freshwater facility is moved into a marine salmonid biosecurity zone unless a veterinary [biosecurity certifier](#) has issued a [biosecurity certificate](#) in respect of the fish, which certifies the following matters:

(a) the vaccination of the fish in accordance with any vaccination program endorsed by the Joint Salmonid Industry Health Group and approved by the Chief Veterinary Officer; and

(b) the fish being from a population of fish (represented by a tank, tanks, pond or ponds of fish) that has passed, not more than 28 days prior to the day of movement, a health assessment which –

- accounts for the history of the population; and
- considers the disease status of all relevant populations on the respective facilities, and
- which may include (at the discretion of the certifier):
 - a gross external inspection of the fish population by a person competent in fish health; and
 - sampling of fish for necropsy and laboratory testing, with sampling biased to the highest risk fish identified within the population.

(c) the fish being sufficiently seawater adapted for entry into the zone.

(2) A salmonid producer must keep a record of all health assessments carried out, and certificates issued, under subclause (1).”

MOS 41. Decontamination of live fish transport vehicles

Similar to MOS 38, this standard is unnecessarily prescriptive about applying a “treatment measure after each individual trip”. This practice was voluntarily applied by industry when acclimating smolt to sea conditions through circulating seawater through transport tanks on route to marine farms. These tanks and trucks required cleaning and decontamination before returning to a freshwater zone, preventing any transfer of marine environment risk.

Over time, diverse transport methods have evolved which makes this prescriptive standard redundant. New methods of moving fish from freshwater to freshwater facilities, and from freshwater facilities to marine farms, present different levels of risk of the movement of potentially contaminated water from the receiving environment back into the freshwater facility.

The standard needs to recognise this and allow companies to manage risk via methodology other than the time, cost and chemical use represented by decontamination “after each individual trip”. This standard should be re-written:

“MOS 41. Decontamination of live fish transport vehicles

Live transport vehicles undergo effective treatment to ensure biosecurity risk related to movements from the freshwater to marine, or freshwater to freshwater environments are managed.”

2.3.3 Schedule 2: Freshwater Operations Standards

FOS 15. Fish Movement records

MOS 15(f)(i) should be rewritten to “the relevant Inland Fisheries Service Transport Approval *or Inland Fisheries Service Exemption Permit*”

As per MOS18 the IFS issues exemptions to seeking transport approvals for every individual fish movement. Although copies of transport approvals may not be available a copy of the exemption will be held by the provider.

FOS 23. Notification, testing and other requirements relating to therapeutants

While the requirement to notify the Chief Veterinary Officer (CVO) of proposed therapeutant use is an appropriate standard for the marine environment, where waters are shared and treatments occur in what is essentially a public location, it is not warranted in a freshwater environment on private land. It is inconsistent with the treatment of any other animal primary producer and a duplication of Environmental Licence conditions for premises regulated by the EPA. It is submitted this standard should be re-written:

“FOS 23. Requirements relating to therapeutants

A salmonid producer engaging in the use of therapeutants must ensure that –

(a) all stock receiving medicated feed is recorded to ensure the correct withholding period (if any) is met; and

(b) all feed equipment used to deliver and distribute medicated feed is appropriately treated after use to manage any risk of residual therapeutant entering any other than treated animals.”

FOS 24. Movement of salmonid equipment

The words “*to and from*” in FOS 24(a) and MOS 24(b) should be replaced with “*between*” as items may be removed from marine farms for disposal and do not necessarily represent a biosecurity risk.

In addition, the definition of “used salmonid equipment” is very broad, as addressed in comments relating to the glossary.

FOS 27. Certification of fish from freshwater facility to marine farm

FOS 27(1)(a) should be written “*the vaccination of the fish in accordance with **any** vaccination program endorsed...*” rather than “*a vaccination program*”, as there may not necessarily be an endorsed vaccination program under certain circumstances.

As per the previous comparison between MOS 39 and MOS 40, FOS 25 is better written in terms of objectivity and avoiding unnecessary prescription. As written FOS 27 requires every tank or pond to be specifically laboratory tested. This penalises operators with many smaller tanks/ponds compared to fewer larger tanks/ponds and does not take into consideration it is the population of fish which represents a risk unit, rather than individual tanks/ponds in the same facility. This standard should be re-written:

“FOS 27. Certification of fish from freshwater facility to marine farm

(1) A salmonid producer must ensure that no live fish or group of live fish from a freshwater facility is moved into a marine salmonid biosecurity zone unless a veterinary [biosecurity certifier](#) has issued a [biosecurity certificate](#) in respect of the fish, which certifies the following matters:

(a) the vaccination of the fish in accordance with any vaccination program endorsed by the Joint Salmonid Industry Health Group and approved by the Chief Veterinary Officer; and

(b) the fish being from a population of fish (represented by a tank, tanks, pond or ponds of fish) that has passed, not more than 28 days prior to the day of movement, a health assessment which –

- accounts for the history of the population; and*
- considers the disease status of all relevant populations on the respective facilities, and*
- which may include (at the discretion of the certifier):*
 - a gross external inspection of the fish population by a person competent in fish health; and*
 - sampling of fish for necropsy and laboratory testing, with sampling biased to the highest risk fish identified within the population.*

(c) the fish being sufficiently seawater adapted for entry into the zone.

(2) A salmonid producer must keep a record of all health assessments carried out, and certificates issued, under subclause (1).”

FOS 29. Decontamination of live fish transport vehicles

This standard is also too prescriptive about applying a “*treatment measure after each individual trip*”. This practice was voluntarily applied by industry when acclimating smolt to sea conditions through circulating seawater through transport tanks on route to marine farms. These tanks and trucks required cleaning and decontamination before returning to a freshwater zone, preventing any transfer of marine environment risk.

Over time, diverse transport methods have evolved which makes this prescriptive standard redundant. New methods of moving fish from freshwater to freshwater facilities, and from freshwater facilities to marine farms, present different levels of risk of the movement of potentially contaminated water from the receiving environment back into the freshwater facility.

As with marine operating standards, it is recommended this standard should be re-written:

“FOS 29. Decontamination of live fish transport vehicles

Live transport vehicles undergo effective treatment to ensure biosecurity risk related to movements from the freshwater to marine, or freshwater to freshwater environments are managed.”

2.3.4 Schedule 4: Biosecurity Program: Tasmanian Salmonid Industry – Glossary

Established marine farm definition should be amended to read:

“established marine farm means a marine farm that has been fully or partially approved under the relevant marine farm development plan process prior to the date of introduction of the Standards. For the avoidance of doubt, this includes farms that have received a marine farming licence, farms that were previously operative, but which have been rested and farms that are currently fully operational.”

The industry has put a lot of resources into acquiring their current farming areas, in their specific locations and their productive potential should not be adversely impacted in retrospect.

Used salmonid equipment has a very broad definition and could include a wide variety of objects which would not pose any biosecurity risk. The definition could be better refined to be *“used salmonid equipment means salmonid equipment used in the primary production of salmonids and which has been, or could be expected to have been, in contact with the salmonids or the water they have been held in.”*

2.3.5 Note on Lease Space Optimisation and Exemptions

As outlined above, when the original blueprint that formed the basis for the operating standards was written, there was an agreed understanding between industry and government that lease space optimisation would be required to permit some improved outcomes. This does not appear feasible in the immediate term, due to the moratorium and the 10 Year Plan process.

In the absence of lease optimisation, some industry exemptions allowed for within the operating standards, may be required on an ongoing basis. These exemptions exist reflect farm locations, the inherent architecture of the industry, biological variability from year to year and an obligation to ensure legally operating companies are not comprised in a business sense. Some exceptions are specifically written into the standards, while others may be accessed through written authorisations.

To ensure fairness the exemptions should be applied consistently either within the operating standards or as written authorisations. Where identified reasonable in the standards currently for an exemption to permit a business to continue to operate, these should be either:

- all specifically permitted within the standards, rather than relying on authorisations; or
- all be granted by written authorisation, and be granted for a period of ten years to align with the 10 Year Plan.

Regardless of process, written authorisations should be irrevocable without agreement of the authorisation holder, unless alternative options are implemented prior.