



Marine Resources Department  
Department of Natural Resources & Environment

20 January 2023

### **DRAFT TASMANIAN SALMON INDUSTRY PLAN**

King Island Council appreciates this opportunity to comment on the Government's Draft Tasmanian Salmon Industry Plan.

The concerns of King Island constituents and large opposition to this industry being established on King Island are accepted and understood by Council. However, King Island Council will continue to take a balanced and unbiased approach to this issue and in the submission of our considerations for the Draft Tasmanian Salmon Industry Plan. In particular, we would like to see improved and tightened regulations governing the industry, especially as relates to environmental protection and the full industry life cycle. Furthermore, any proposals to bring the industry into King Island waters would have to be bespoke designed to withstand our highly volatile waters, which could preclude many types of commercial fishing farm operations established in calmer waters elsewhere in Tasmania.

The following comments are provided for government's consideration in the finalisation of the Plan.

- **Transparency and communications**

Council notes that the only advice provided about the Draft Plan was a single email to our generic email address on the day the consultation opened. No efforts seem to have been made to raise community awareness of the event through our local paper nor direct contact made to businesses or industry organisations on the Island, such as our Chamber of Commerce.

On the same issue, there was little background provided at the Community Briefing on King Island regarding the salmon industry's current operations and outputs. It is not straightforward to get this information independently, with details spread across a variety of government and non-government websites. Council suggests this lack of easily accessible and understandable material about the industry makes it hard for communities to be informed and so increases the levels of cynicism and mistrust of industry operators.

We request that the Plan include a commitment to proactive and effective engagement with community, industry and local government.



- **Process for approval of new operations**

While the Draft Plan doesn't specify a process for approval of new farming operations, the information shared at the King Island community briefing on 12 January suggested that public consultation would be an essential part of the process.

To ensure the credibility of the consultation process, Council suggests that any such consultation be led by Government, rather than by the operator making an application. Since Tassal was granted a permit to explore the potential for salmon farming off our Island's east coast in 2017, very little meaningful information has been shared with Council or our community regarding the outcomes of that exploration. A number of our ratepayers have cited this as a reason for their cynicism regarding the transparency of the industry.

- **Clarification on the role of local government authorities**

There is no reference to the role of local government authorities (LGAs) in the Draft Plan. As elected representatives of our communities, Councillors and Aldermen have committed to bring those communities' best interests to the attention of regional, state and federal government and to hold those other levels of government accountable to those interests. As such, King Island Council requests that LGAs be empowered in the Plan to represent the best interests of their communities with regard to salmon farming operations, including the approval process for new or amended operations.

- **Community compensation**

The Draft Plan notes a cost to the salmon industry, over and above the cost recovery for government administration of the industry, as compensation for the potential restriction of community use of our waterways and other natural assets. It is further suggested that this compensation would be directed at community infrastructure and services. King Island Council is wholly supportive of this approach and further suggests that this compensation is directed largely at the communities which are directly impacted by those aquaculture operations, rather than directed solely to state-wide community infrastructure and services.

- **Total impact of operations to be considered**

Priority Outcome 2 of the Draft Plan refers to healthy ecosystems and, when discussed at the King Island community briefing on January 12, set an expectation that reasonable standards would be set for the land and water-based operations of the salmon industry in Tasmania. Council would like to see the standards for salmon farming extended to consider the total impact of operations, from the impacts on ecosystems where the salmon feed is sourced, through to the disposal of waste at the end of the salmon's life cycle and at the decommissioning of infrastructure. Details of these standards and operators' compliance with them should be made readily available to community and other stakeholders.

- **Adaptive management to be phased out**

The practice of adaptive management in an environmental context has been shown to create significant issues in a number of areas. This is not limited to the salmon industry, but is certainly relevant to it. Council suggests that the Plan aim to phase out the practice of adaptive management, instead making it incumbent on operators to prove no unreasonable damage will be caused by their operations in a specific area before they are granted a permit to operate.



Council is happy to provide any further clarification or information, should they be required, and looks forward to seeing the final Plan in the coming months.

Yours sincerely

  
Cr. Marcus Blackie  
Mayor

