

Marine Resources Department  
Department of Natural Resources and Environment

20 January 2023

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

The King Island Brand Management Group (KIBMG) was formed over a decade ago in response to concerns within the Island's community that the King Island name was being used by non-King Island producers to attract premium prices. Many consumers in Australia and beyond know the name King Island and associate it with high quality, premium produce – even though some of those don't know where King Island is or even associate it with being a place, rather than just a brand name.

Our reliance on expensive sea and air freight to get product off-Island and bring resources on to the Island means our cost of doing business is necessarily higher than most of our counterparts in mainland Tasmania and mainland Australia. This means we are reliant on selling premium produce so as to attract prices which cover that cost of doing business. When non-King Island producers sell their wares using the King Island name, without needing to cover the same cost of doing business or necessarily producing to the same level of quality, this affects our producers' ability to compete in those markets.

The ability to charge the necessary premium relies on our reputation. Any activity which detracts from or is perceived to detract from the quality of our Island's produce will damage that reputation, ultimately limiting our producers' ability to survive in business. To this end, KIBMG is advocating that an Australian system of Geographical Indications (GIs) be introduced for food and beverage products. Such a system could offer far improved protection to small producers than can currently be achieved through the trademark, certification mark and consumer protection legislation and systems currently in place.

Our response to the Draft Tasmanian Salmon Industry Plan is informed by this background, together with feedback received from our members and conversation at the on-Island community briefing delivered by NRE on 12 January 2023.

- **Reputation**

As noted above, King Island producers rely on the brand and reputation of the Island overall to attract a premium price which offsets the additional cost of doing business on a remote island. We appreciate the efforts made in the Draft Plan to address environmental



standards and transparency of operations in the salmon industry. We believe it is imperative that the public perception of the salmon industry and the credibility of government in enforcing standards be significantly improved to protect the brand and reputation of the communities that are home to salmon farming operations.

- **Provenance protection**

The Draft Plan stipulates that it has been designed to work together with existing legislation, policy and planning frameworks and has the flexibility to adjust to new strategic initiatives as they arise. We suggest that the potential for an Australian geographical indication (GI) system for food and beverage products be considered specifically in the finalisation of the Plan. In such a system, rules would be put in place specific to products from specified regions that hold producers accountable for the quality and provenance of their product, providing assurance to the consumer and protecting against imitation. While an Australian GI system is still only a potential, there would be benefits to adopting some of these practices now.

KIBMG suggests the final Plan should set out standards specific to each area of the state that hosts farmed aquaculture operations which set the standards for that specific area. For a consumer product to be labelled as coming from “King Island”, “Storm Bay, or even “Tasmanian”, it would need to be grown and processed within a specified geographical area, with stocking density, source of feed, chemicals, etc, all agreed in advance. The requirements of the Salmon Industry Plan would set the minimum standards with this, with the ability to apply higher standards at different locations, for example to create a premium line of product.

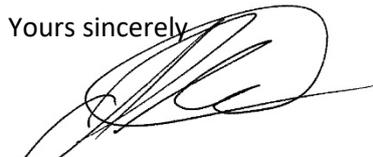
- **Salmon Industry Plan as a minimum standard**

As noted above, KIBMG sees the Salmon Industry Plan as a minimum standard that must be met, with operators encouraged to exceed those standards wherever possible. Similarly, while this Plan refers primarily to the salmon industry, we would encourage Government to use this as the base point for the development of standards for any other aquaculture industry in Tasmania, with every effort made to improve those standards in each new document.

As technology develops and research provides greater insights into the impact of industry on our environment and community, the Salmon Plan should be reviewed to ensure the standards set are still reasonable in light of emerging knowledge and capability. Periodic review points should be stipulated within the Plan, with criteria agreed that would trigger additional review.

Thank you for the opportunity to provide feedback on the draft Tasmanian Salmon Industry Plan. We will be happy to provide any further information or clarification if required and look forward to being advised of the next steps in this process.

Yours sincerely



Dr. Duncan McFie  
**Chair**

