



**tasmanian conservation trust inc**

Marine Farming Planning Review Panel  
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### **Terms of Reference for Proposed Salmonid Farming Operations at Okehampton Bay**

The Tasmanian Conservation Trust wishes to respond to the Terms of Reference for Proposed Salmonid Farming Operations at Okehampton Bay, as stated on the DPIWWE web page, but first we must raise some broader concerns regarding the inappropriateness of having any fin-fish farming on Tasmania's east coast and of having this review undertaken by the Marine Farming Planning Review Panel.

The Okehampton marine farming zone should never have been created, and certainly not approved for finfish farming. The committee undertaking the assessment of proposed salmonid farming operations at Okehampton Bay, the Marine Farming Planning Review Panel, has previously approved farming of finfish in this zone during the development of the current management plan. It does not seem possible that this committee can undertake an independent and objective assessment of its own work if that assessment is to have any credibility in the wider community.

Tasmania's east coast environment, economic and social values are likely to be severely damaged by the establishment of fin fish farms in its marine environment. This industry would create visual and noise pollution, exclude other users and dump large amounts of waste into the marine environment.

Even if one ignores all the other problems associated with this zone, the relevant marine farming development plan [*Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 (Reviewed November 2007) (Modified 17 May 2010)*] itself states that water temperatures "... are considered suitable for farming finfish during most summer periods ...". What happens when the water temperatures are not suitable? Climate change

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and warming sea temperatures are likely to make this site less suitable and may result in large-scale fish mortality events.

Tourism, fishing and a variety of recreational activities associated with the coastal and marine environment are vital part of the east coast. Given the widespread public concern expressed about the proposed expansion of the Tasmanian fish farming industry into the east coast, it is obvious that many in the wider community hold the view that the introduction of fish farms into this part of Tasmania is inappropriate.

### **Response to the Terms of Reference**

There are shortcomings in:

- the environmental science supporting the proposed environmental monitoring and management of salmon farming at Okehampton Bay within the Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 (as reviewed in 2007) area;
- the adequacy of the environmental baseline data and surveys to allow the Director, Environmental Protection Authority to establish a contemporary environmental management regime for the proposed marine farming activity; and
- the adequacy of the Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 to allow for the implementation of a contemporary environmental management regime for proposed salmonid marine farming at Okehampton Bay.

The more significant of these shortcomings will be outlined below.

There are only 2 baseline sites mentioned in the baseline survey document (Baseline Environmental Assessment of Marine Farming Lease # 236 at Okehampton Bay Finfish Farm February 2000 Report to Spring Bay Salmon by Aquenal Pty Ltd). There are no baseline sites on any rocky reef areas.

There should be documented justification for the number and distribution of sites used in the baseline survey along with a description of how the area should be monitored and assessed to identify problems were they to occur. There is little point in collecting data unless there is a strategy to make use of the data. In this case the baseline data is presumably going to be used to identify changes over time and impacts of finfish farming in this area, otherwise why have control sites?

Perhaps results from MPA surveys might be used as part of the baseline data?

There is no information presented on fishing activities and productivity in this area. For example, what has been the local recreational catch of flathead and how might this be monitored in the future to identify changes due to finfish farming?

Have sediment samples been kept for future reference. There is an increasing amount of anecdotal evidence (from the Tasmanian Abalone Council for example) that raises concerns about sedimentation in the south east being related to finfish farms (along with changes to macroalgae communities). Samples of existing sediments should be kept so that they can be compared with future samples. The strategy for doing this future assessment should be devised now so that the correct samples and data can be collected.

There is also no data on nutrient levels in the water column. Given the recent history of toxic algal blooms along Tasmania's east and southeast coastlines with disastrous implications for wild fisheries, nutrient inputs that may encourage plankton blooms should be carefully assessed. It is the view of the TCT that there should be no new sources of pollution dumping nutrients or other harmful materials into Tasmania's marine environment.

Even if one believes that a significant expansion of aquaculture on Tasmania's east coast is acceptable, which is not the position of the Tasmania Conservation Trust, several things would need to be done to ensure that there is at least some expectation that an environmental disaster would be avoided. There would need to be a comprehensive baseline assessment of the east coast from at least Eaglehawk neck to Eddystone Point. That baseline study would look at rock reef as well as soft sediment habitats. There would also need to be a longer-term study on nutrient inputs and behaviour in this region to ensure that increased inputs due to aquaculture do not exacerbate the damaging toxic plankton blooms that are becoming a feature of the east coast environment and a concern for both recreational and commercial wild fisheries, as well as the aquaculture industry itself.

The Tasmanian Conservation Trust would like to point out that we have little confidence in the Tasmanian Government's current aquaculture planning process. We would like to see the role of the Marine Farming Planning Review Panel taken over by the Tasmanian Planning Commission. This would provide greater transparency, require rational justifications for planning decisions and provide an appeals process. It would also save money as a costly and redundant planning process could be dismantled.

The DPIPWE web page (<http://dpiipwe.tas.gov.au/sea-fishing-aquaculture/marine-farming-aquaculture/okehampton-bay-submissions> downloaded on 17/9/16) inviting public submissions addressing the terms of reference for proposed salmonid farming operations at Okehampton Bay suggests that the Marine Farming Planning Review Panel will be undertaking an "independent assessment". It should be noted that this committee has already approved finfish farming in this zone during the establishment of the Marine Farming Development Plan. It is therefore hard to see how the Marine Farming Planning Review Panel can perform an independent assessment on its own creation. In fact it is the view of the Tasmanian Conservation Trust that the Marine Farming Planning Review Panel has an impossible conflict of interest associated with this review process and cannot be expected to make a credible assessment of its own work.

The Tasmanian Conservation Trust looks forward with interest to see how the Marine Farming Planning Review Panel deals with its own conflict of interest and how the current planning process balances the loss of amenity associated with this aquaculture industry development.

### **Concerns regarding the legal status of the review process**

The DPIPWE web page does not adequately describe what the process will be beyond the receipt of submissions in response to the terms of reference and this should have been done when submissions were first requested. The

DPIPWE web site merely states that 'Submissions will be considered by the Panel as part of its report to the Minister for Primary Industries and Water'.

Is this 'review' a formal review of the 'Great Oyster Bay and Mercury Passage Marine Farming Development Plan October 1998 (as reviewed in 2007)', pursuant to Division 4 of the Marine Farming Planning Act 1995 and/or any other part of the Act?

Is the review occurring outside of any process prescribed under the Act? If so, is there any requirement for the Panel and/or the Minister to respond to, or act, on any concerns raised in submissions?

Why has the public not been informed of the status of the review that is being undertaken? Does the government and/or DPIPWE intend to clarify the status of the review?

Regardless of the process being followed, we request that public hearings be held as per section 9(3) of the Marine Farming Planning Act 1995.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter McGlone', written in a cursive style.

Peter McGlone  
Director  
Tasmanian Conservation Trust