



## ***Tasmanian Salmonid Growers Association Ltd.***

***ABN 27 009 590 729***

28/06/2021

Mr Rick Wilson MP  
Chair Standing Committee on Agriculture and Water Resources  
agriculture.reps@aph.gov.au

RE: Inquiry into the Australian Aquaculture Sector

Dear Mr Wilson

The Tasmanian Salmonid Growers Association (TSGA) welcomes the opportunity to make a submission on the aquaculture industry as it relates to salmonid farming in Tasmania.

This submission has been prepared by the TSGA and has the support of its member companies: Huon Aquaculture, Petuna and Tassal.

The salmonid farming industry in Tasmania is a major contributor to our economy and our social fabric, not only in our state but also for Australia.

The Tasmanian Agri-food Scorecard 2018-19 provides the following information about the Tasmanian salmon industry:

- Value of Production of \$796 million.
- Processed value of \$1.034 billion.
- \$108 million international export value.
- \$841 million interstate export value.
- The sector supports more than 2,000 direct FTE jobs, and 10,000 indirect FTE jobs.
- The Tasmanian salmon industry is the largest fishery in Australia, and the largest Tasmanian farming activity.
- The member companies of the TSGA are vertically integrated, further adding to their economic benefit here in Tasmania, but also within other communities in wider Australia.

The Australian Fisheries and Aquaculture Production report for 2018

(<https://www.agriculture.gov.au/abares/research-topics/fisheries/fisheries-and-aquaculture-statistics>) tells us Tasmania is the highest value state in Australia (\$873.5 million GVP) for aquaculture and that salmonids are the most valuable aquaculture species in Australia (\$838.3 million).

These figures provide evidence that the growth in Tasmania's agri-food value is due in a large part to the salmon industry.

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Farmed salmon is the leading farming activity in Tasmania, ahead of dairy, vegetables, poppies, pyrethrum, beef, fine wool, wine, and the apple industry.

The member companies of the TSGA also have great impact on the larger social fabric of the areas they operate within, providing meaningful employment and contracts to thousands of highly qualified, talented people who are passionate about Tasmania and the communities they live in. These people have chosen to stay in Tasmania, raise their families and spend their salaries, supporting the local fire brigade or sporting club – contributing both economically and socially to the fabric of the State.

The ancillary sector goes beyond farming and processing to technology and monitoring, vessels, pens, nets, feed, training, transport, logistics, research, public relations, IT and retail. These jobs are not dependent on the time of year, nor on the fluctuating tourism industry - they are secure and ongoing.

Our members are proud contributors and supporters of the Tasmanian brand, assisting to promote Tasmania as a leader in sustainable food production and at the forefront of innovation globally.

There are a number of opportunities that have been identified for the future of salmonid farming. They include:

- Coastal farming in suitable areas in Tasmanian waters.
- Off-shore marine farming in Commonwealth waters.
- Participation in the circular economy.
- Future fish farming will be a mix of on-shore, near-shore, and offshore.

Despite the value of salmon farming to Tasmania and Australia, coupled with the exciting opportunities for expansion here, barriers do exist.

#### Coastal farming in Tasmanian waters

The identification of marine waters suitable for finfish farming is occurring as part of the Tasmanian State Governments' industry growth plan for salmon farming. Unfortunately, the process to initially identify the areas suitable was one embedded in politics. A revised process is underway; however, this has led to uncertainty within the Tasmanian community and without clear guidelines, opposition is now growing at an alarming rate.

If areas are deemed as suitable, a long planning process inclusive of an Environmental Impact Statement must be undertaken to achieve approval by way of a lease and licence with the Crown and then an environmental licence to farm through the EPA. In addition to the State

requirements the Commonwealth will also require approval if the EPBC Act is deemed to apply. These processes are not contested; however, the process can take many years to see approval, is often replicating itself, and requires companies to invest both considerable time and funds before it can grow salmon in Tasmanian waters.

#### Off-shore marine farming in Commonwealth waters

The Blue Economy CRC is currently working to assist the expansion of marine farming of salmon into Commonwealth Waters. This requires innovations in on-shore facilities, boats, pens, power, communication, feed, harvest, and changes to legislation.

#### Participation in the circular economy

The TSGA has a strategic project to reduce the amount of waste generated by finfish farming through participation in the circular economy. While this project is only just beginning it does have the ability to start new industries here in Tasmania and Australia to recapture and reuse significant resources. Investment in start-up industries and innovation, alongside rethinking regulations that may enable some of that innovation, will be required by both levels of Government before we can reach our goals.

#### Land-based finfish farming

Complete land-based salmon farming is still in its infancy. While this is emerging, the salmon farming practices in Tasmania are a hybrid of growing salmon on land and at sea. This model uses the Recirculated Aquaculture System (RAS) to grow salmon to a larger size on land before they are transferred to sea which allows the industry to farm sustainably and employ more local people than it would otherwise.

The complete land-based farming systems in use - and there are less than a dozen around the world at last count – have significant environmental impact on waste systems and amenity as well as significant draw-down on the area's power requirements. It is estimated that power requirements to farm fish on land to the same level that we do today are above those that Tasmania currently generates. The issue of how to dispose of waste collected within the facility is high on the barriers to establishing more land-based fish farming in Tasmania. Current environmental legislation does not permit the disposal of saltwater waste on land, nor can the waste be recycled for fertiliser or compost due to its very high salt content. In addition, the disposal of waste produced by on land salmon farming into the ocean is not permitted in Tasmania.

## Regulation

Salmon companies in Tasmania are vertically integrated. This means that they are involved in all aspects of bringing salmon to your dinner plate or sushi roll. It also means that the industry is regulated with 42 different pieces of legislation or regulation – all of which are complied with. If this were streamlined with a one stop shop or a coordinator who was across all aspects of compliance for the industry some efficiencies could be had – however that coordinator would need to be across federal, state and local regulatory environments. From refrigeration requirements at local council level to licence requirements at state level to AMSA requirements for the largest commercial fleet in Australia - the coordination of all levels of regulation is a constant for the industry.

The TSGA believes that science needs to inform regulation. A relationship with science based organisations is crucial to have unbiased factual regulation that is good for our communities and our environments that we work within. Science uses a process called Adaptive Management which cannot be dismissed for its ability to provide flexibility and opportunities for innovation. Adaptive management principles inform our industry in the dynamic ocean environments we work in. This means that we need a bit of salmon farming to occur in order to inform the science currently underway, which in turn forms the regulations which are what our leases and licences need to be based upon.

## National Aquaculture Strategy 2017

The TSGA notes that the Australian Government had identified a series of priorities in 2017 within the *National Aquaculture Strategy*. The strategy details a number of significant issues for aquaculture including:

- Overly complex and duplicate regulatory processes,
- Lack of clear regulatory framework for undertaking aquaculture in Commonwealth waters,
- Difficulty in accessing veterinary chemicals for minor uses,
- Concerns about biosecurity risks; and
- Concerns about lack of community understanding of the Australian aquaculture industry's environment credentials.

It would be fair to say that all of the above still hold true. The Government's plan has not led to change thus far, although the timeframe for achievement of a \$2billion dollar industry is not until 2027. The TSGA would like to see a reset of this plan, with yearly reporting, assigned accountability and better coordination with Governments and industry alike.

## Summary

In order, for the aquaculture industry to continue to grow and contribute to the Australian economy, the following support is required:

- Development of major infrastructure to support the growth of the aquaculture industry, including port facilities and renewable energy hubs.
- Streamlining of regulation throughout all Australian jurisdictions to avoid duplication.
- Support for the establishment of circular economies.
- Continued access to new growing regions as appropriate.
- Investment in applied research delivering outcomes for the aquaculture industry, including advancing innovative technologies, but also training for industry focused researchers.
- Funding of the AQUA plan initiatives for biosecurity.
- A sensible approach to AGVET chemical use, especially for minor-use under veterinary requirements chemicals.
- A reset of the Australian Aquaculture Strategy 2017 to strengthen the government's commitment to its goals through assigned accountability and yearly reporting.

The TSGA would like to thank the Standing Committee for this inquiry. It is the hope of the TSGA that this submission, which must be considered alongside each individual company submission to better understand commercial barriers and opportunities for expansion, will assist the Committee with its inquiry. If further information is required the TSGA welcomes contact from any member of the Committee. More details and tours of the industry members facilities could also be arranged upon request.

Yours sincerely

Jen Fry  
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TSGA