

## Neighbours of Fish Farming Submission Senate Inquiry into Greenwashing Sept 2025

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In 2023 Neighbours of Fish Farming (NOFF) wrote a submission to the senate greenwashing Inquiry signed on by 15 Tasmanian organisations.

Since then, more examples of greenwashing have caught our attention and we take this opportunity to put further examples before the committee.

We particularly refer to the terms of reference:

1. the impact of misleading environmental and sustainability claims on consumers;
2. legislative options to protect consumers from greenwashing in Australia; and
3. any other related matters

Further support for recommendations set out in our previous submission:

**Recommendation 1:** Establish legally enforceable standards for environmental and sustainability claims, which:

- a) include a list of specific claims, marketing terms and practices that would be considered in breach of standards due to being vague and broad. This should include, but not limited to, generic claims such as “sustainable” “responsible” “eco-friendly” “ocean-friendly” “climate friendly” “carbon neutral” “green”. This should apply to written claims, logos and any other potential marketing.
- b) detail minimum substantiation and verification requirements for all environmental and sustainability claims. Claim users should make evidence to back up their claims publicly available and easily accessible.
- c) require environmental and sustainability claims be based on a full lifecycle assessment (i.e., cradle to grave) to ensure a product’s complete environmental impact from extraction, processing of raw materials, manufacturing, distribution, use and final disposal is reflected accurately in any claim.
- d) require climate related claims to be based on scopes 1-3 greenhouse gas emissions and the adoption of mandatory disclosure.

**Recommendation 2:** Explore ways to regulate non-commercial actors that contribute to corporate greenwashing including, but not limited to: certifications, non-government organisations, partnerships, and government agencies.

**Recommendation 3:** Identify and investigate specific sectors that are prone to greenwashing and/or where consumers are likely to be misled or challenged by understanding environmental and sustainability claims, and where consumer harm is likely. In particular, the committee should prioritise investigating the Tasmanian Atlantic farmed salmon industry.

During February of 2025 Tasmania’s south Eastern beaches were polluted with rotting salmon flesh and fish oil.<sup>1</sup> In the following weeks, it was revealed that millions of farmed fish had died<sup>2</sup> from a disease Salmonid Rickettsial Septicaemia, caused by the bacteria

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1

<https://www.abc.net.au/news/2025-02-21/salmon-chunks-decomposing-fish-dumped-copping/104965402>

2

<https://www.theguardian.com/australia-news/2025/mar/08/million-salmon-dumped-in-landfill-after-unprecedented-mass-death-of-at-tasmanian-fish-farms-ntwnfb>

*Piscirickettsia salmonis*. Residents and recreational fishers expressed concern during this time, and in the public, there was a distinct absence from relevant Ministers on the issue, including Minister for business Eric Abetz, Minister for the Environment Madeleine Ogilvie, and Minister for Health Jacqui Petrusma.

This also coincided with supermarket protests calling on Tasmanian *Hill Street Grocer* to stop selling farmed salmon.

Rather than comment in support or concern for constituents in Franklin who were experiencing the environmental pollution of dead salmon and bio-waste on their beaches, what the public saw were prominent Tasmanian politicians and a senator posing with salmon packets on social media promoting the product during a period of crisis.<sup>3, 4, 5</sup>

Furthermore, industry CEO Luke Martin conceded publicly that “Yes, absolutely, and that’s standard,” when questioned by the media whether diseased salmon were being harvested for human consumption.<sup>6</sup> Tasmanian politicians claim in their public statements that the product is “healthy” which, while not an environmental claim, could be interpreted as an attempt to obfuscate the outbreak of disease and its broader consequences in Tasmanian public waterways.

Use of the antibiotic oxytetracycline during this period was revealed publicly in June. Over 1 tonne of antibiotics were administered directly into the waterway<sup>7</sup>, and EPA testing revealed that samples of wild fish caught near a Huon Aquaculture lease were found to have levels of antibiotic 12 times higher than the permissible thresholds for farmed salmon destined for consumers.<sup>8</sup> This constitutes a potential threat to public health due to WHO concerns about antimicrobial resistance<sup>9</sup>, and a threat to the environment, as microbial life is a cornerstone of the ecosystem. We argue that the prevalence of disease of this scale and treatment with antibiotics is not “sustainable” “responsible” or “healthy”, yet these labels continue to be used on product packaging.<sup>10</sup>

As we watch the algal bloom unfolding in South Australia Tasmanian scientists are voicing concern over the likelihood of a similar event occurring in Tasmanian waterways.<sup>11</sup> Dr Scott Bennett told ABC radio Hobart that the best way to build resilience in our marine ecosystem and mitigate the risk of catastrophic bloom events, “But there are things we can do that just bolster the,...resilience of our coastal waterways and our reefs to these impacts. And so

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<sup>3</sup> Appendix item i) Minister Eric Abetz posing with salmon on February 21,

<sup>4</sup> Appendix item ii) Minister Erric Abetz posing with salmon on February 25

<sup>5</sup> Appendix item iii) Senator Jonno Duniam posing with salmon on March 3

<sup>6</sup>

<https://www.thesaturdaypaper.com.au/news/health/2025/04/05/exclusive-salmon-infected-pens-sold-human-consumption>

<sup>7</sup>

<https://www.abc.net.au/news/2025-06-03/antibiotics-in-wild-fish-near-salmon-farm-huon-tasmania/105366750>

<sup>8</sup>

<https://www.abc.net.au/news/2025-06-03/antibiotics-in-wild-fish-near-salmon-farm-huon-tasmania/105366750>

<sup>9</sup> <https://www.who.int/news-room/fact-sheets/detail/antimicrobial-resistance>

<sup>10</sup> Appendix item iv) Woolworths own brand salmon labelled as “responsibly sourced”

<sup>11</sup>

<https://www.abc.net.au/listen/programs/hobart-breakfast/scott-bennett-great-southern-reef-algal-bloom/105545864>

keeping nutrient levels down, so controlling terrestrial runoff or nutrient inputs into the system that will help catalyse these blooms is a really important one.”<sup>12</sup>

Understanding that Tasmania’s waterways are rising in temperature at a rate 4 times the global average<sup>13</sup> means that responsible management is required to mitigate the risk of amplification of natural vectors occurring in the environment, such as algal blooms, and prevalence of disease. To continue adding the high level of nutrient inputs into the ecosystem that the salmon industry does<sup>14</sup> should not be considered “responsible” management of the industry within the broader environment. Tasmanian salmon farms produce 6 times more pollution each year than Tasmania’s entire sewage system, releasing 4193 tonnes per year.

Our submission argues that the “responsible” action, would be to reduce polluting inputs such as nitrogen waste, knowing the risks of ecosystem imbalance are likely, and that consumers are being misled with statements on packaging such as “Responsibly sources in harmony with nature”<sup>15</sup>. It is also notable that use of a tonne of antibiotic directly into the waterway, is not an action “in harmony with nature” and is therefore misleading at best, and constitutes a vague and misleading greenwashing claim that shoppers are led to take at face value to be true.

Finally, in the midst of the die off and antibiotic use in the East coast salmon operations in Tasmanian waterways, the West coast operations in Macquarie Harbour were being greenwashed in what amounts to be likely the most transparent example of state capture in legislative history when it comes to the environment.

In March 2025 the Albanese government made the controversial decision to change the EPBC Act so that it can no longer be used to capture and regulate the negative impacts of the Salmon industry, with specific interest given to operations in Macquarie Harbour, where, according to the Australian Government’s own conservation advice,<sup>16</sup> salmon farming is having a “catastrophic impact” on the Maugean skate. The Maugean skate is listed as endangered under the EPBC Act and its final critical habitat is Macquarie

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<sup>12</sup>

<https://www.abc.net.au/listen/programs/hobart-breakfast/scott-bennett-great-southern-reef-algal-bloom/105545864>

<sup>13</sup>

<https://www.abc.net.au/news/2020-02-08/tasmania-east-coast-warming-four-times-global-average/11889628>

<sup>14</sup>

<https://australiainstitute.org.au/post/the-big-stink-of-tasmanian-salmon-farms-six-times-more-pollution-than-tasmanian-sewage/>

<sup>15</sup> Appendix v) Huon Aquaculture salmon sold via the coles website, with statement “Responsibly sourced in harmony with nature”

<sup>16</sup>

<https://www.dcceew.gov.au/sites/default/files/documents/consultation-document-maugean-skate-2024.pdf>

Harbour. The Maugean skate is listed as a natural value of The World Wilderness Heritage Area<sup>17</sup>

UNESCO notes that “Australia’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides legal protection for Outstanding Universal Value by regulating actions occurring within, or outside, the World Heritage boundary. A statutory management plan is in place and is reviewed at least every seven years. Over 80 per cent of the property is zoned as ‘wilderness’.”<sup>18</sup>

Despite this, the EPBC Act was altered by the Albanese government to ensure that the industry will not have to undergo an EPBC Act assessment,<sup>19</sup> after writing to the industry to promise such an action.<sup>20</sup>

Later this year, on the basis of this legislation change, Environment Minister Murray Watt made the decision not to reconsider the original approvals for the Macquarie Harbour salmon industry expansion 2012, therefore bypassing any legal requirement to assess the impact of the industry under the EPBC Act.<sup>21</sup>

To undermine the federal environment laws, specifically to bypass an assessment of industry operations under the EPBC Act, and then to continue to sell the product labelled as “Responsibly sourced” should be considered hollow.

The impact that the vague claim “responsibly sourced” and “in harmony with nature” have on consumers is misleading. The average consumer should not need to dedicate hours of research on the politics and impacts of a product in order to make a decision in the supermarket aisles. The average consumer should be able to take the labelling at face value, and in the case of Tasmanian farmed salmon, they can not. The prevalence of antibiotics in the marine environment, the catastrophic threat of extinction to a gondwanan relic, and nitrogen pollution 6 times higher than a population of half a million directly flowing into the waterways of Tasmania is not “Responsible” or “in Harmony with Nature”.

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<sup>17</sup> <https://www.dcceew.gov.au/sites/default/files/documents/78995.pdf>

<sup>18</sup> <https://whc.unesco.org/en/list/181/>

<sup>19</sup> <https://www.abc.net.au/news/2025-03-25/pm-albanese-introduces-legislation-to-protect-salmon-farming/105088538>

<sup>20</sup> <https://www.abc.net.au/news/2025-02-15/prime-minister-salmon-farming-tasmania-legislation-change/104941226>

<sup>21</sup> <https://minister.dcceew.gov.au/watt/media-releases/decision-allows-salmon-farming-continue-macquarie-harbour>

We call for legislated reform that excludes the use of false and misleading or vague claims on packaging, and more stringent protocols for the engagement of third party actors and in the case of Ministers, where industrial support is likely in contradiction to their portfolios.

## Appendix

i) Minister Eric Abetz posing with salmon, published on Facebook, February 21

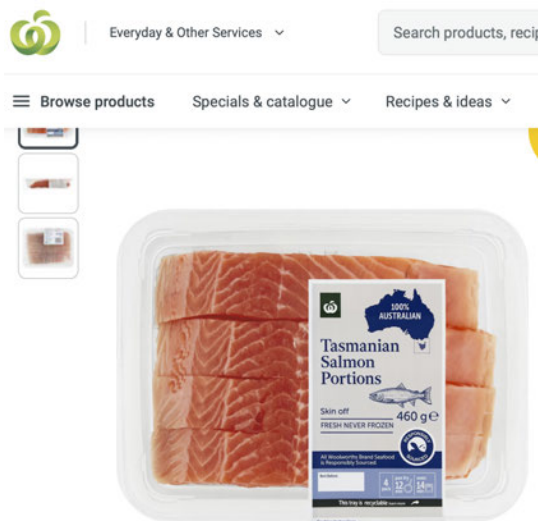


ii) Minister Abetz posing with salmon, published on facebook February 25

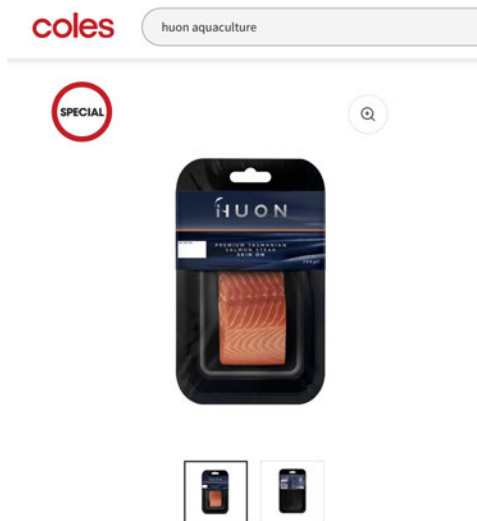




iii) Senator Jonno Duniam posing with salmon products, published to facebook, March 3 to facebook.



iv) Woolworths packaging displaying the "Responsibly sourced" logo and the statement "All Woolworths brand seafood is responsibly sourced."



v) Huon Aquaculture salmon sold via coles website with the statement “Responsibly sourced in harmony with nature”