



1 June 2015

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

By email: [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au)

Dear Sir, Madam

**Senate inquiry: Regulation of the fin-fish aquaculture industry in Tasmania**

Thank you for the opportunity to contribute to the Senate Standing Committee's inquiry into the regulation of the fin-fish aquaculture industry in Tasmania.

RSPCA Australia is currently working with the Tasmanian salmon industry to develop standards for farmed Atlantic salmon under the RSPCA Approved Farming Scheme. Although our standards are primarily aimed at the welfare of farmed fish, the potential for aquaculture to have wider environmental impacts should also be considered as this will ultimately also impact on fish welfare.

Compliance with regulatory requirements in relation to environmental impact management and monitoring will be a prerequisite for salmon growers wishing to join the RSPCA Approved Farming Scheme.

Several salmon aquaculture companies in Tasmania have achieved or are seeking certification for environmental stewardship. Such certification often requires environmental management practices that exceed those required by legislation and the industry should be commended for aiming to achieve beyond compliance standards in responsible farming practices. Another prerequisite for salmon growers wishing to join the RSPCA Approved Farming Scheme will be ongoing compliance with such an aquaculture stewardship program. We will assess the suitability of such schemes on a case-by-case basis and consider whether, among other things, the following elements are covered: management and monitoring of ecological impact, benthic and water quality, pen net biofouling, fallowing practices, escapee prevention, predator control, extraneous species management, and waste and wastewater management and monitoring - these are all relevant to fish welfare.

In addition to fully complying with all relevant legislation, industry should demonstrably and proactively review their environmental protection policies as developments in research and technology allow. In addition, all farm staff should recognise their duty to care for the natural environment and monitor possible impacts on it.

RSPCA Australia Inc.  
ABN 99 668 654 249

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P 02 6282 8300  
F 02 6282 8311  
E [rspca@rspca.org.au](mailto:rspca@rspca.org.au)  
W [rspca.org.au](http://rspca.org.au)

PO Box 265  
Deakin West ACT 2600





Data collected on waterway health and the impact of fish farming practices on waterway health, including but not limited to threatened and endangered species, should be meaningful, on-going and available for public scrutiny thus providing an incentive and a pathway towards continuous improvement for the aquaculture operations involved. At the same time, the data collected should trigger regular and on-going review of regulatory requirements by the relevant authority to ensure that the desired effect - waterway health - is being achieved.

Responsible farming practices will help minimise any environmental impact of farming operations as well as help contribute to improved fish welfare through the provision of optimal water quality.

Please don't hesitate to contact us should you require further information.

Kind regards

Heather Neil  
Chief Executive Officer  
RSPCA Australia