12 September 2022

Please find attached a Tasmanian Seafood Industry Council (TSIC) response to the Governments Discussion Paper: Towards a 10-Year Salmon Plan.

TSIC has already provided input to this consultation process during a meeting between the TSIC CEO and the Secretary of NRE Tas and other Government representatives.

This written submission reiterates the key input provided by TSIC in that forum.

This submission has been endorsed by the TSIC Board.

Yours Sincerely,

Julian Harrington

Chief Executive

Tasmanian Seafood Industry Council
PO Box 878 SANDY BAY TAS 7006
P: 03 6224 2332
tsic@tsic.org.au www.tsic.org.au

TSIC Overview

The Tasmanian Seafood Industry Council (TSIC) is the peak body representing the interests of wild catch fishers, marine farming businesses and seafood processing businesses in Tasmania.

TSIC Policy aims to support the interests and access rights of our fishers, marine farmers and seafood processors. Central to TSIC policy is support for four key seafood industry outcomes, which have a focus on environmental, social and economic outcomes from seafood.

1. Long-term sustainability of the marine environment.
2. Opportunity for long term, full-time employment.
3. Direct economic return to Tasmania, particularly in regional communities.
4. Provision of quality sustainable Tasmanian seafood to Tasmanian's and the world.

When considering the TSIC response, it is important to note that TSICs role is to represent the interests of the salmon industry, as well as the interests of marine farming sectors, wild catch fishers and seafood processors. Many within the broader seafood community support the salmon aquaculture industry; many are indifferent to the salmon industry, and others oppose the salmon aquaculture industry.

These contrasting perceptions of salmon aquaculture within the commercial seafood sector and broader commercial seafood community makes it challenging for TSIC.

Towards a 10-Year Salmon Plan Discussion Paper

TSIC notes that many of the topics and discussion questions within the Towards a 10-Year Salmon Plan Discussion Paper are very technical and would require specific knowledge and expertise to fully understand and comprehend.

TSIC is not able to adequately address many of the questions or theme areas, so instead we have provided high level policy statements to highlight expectations.

TSIC SUBMISSION

Towards a 10-Year Salmon Plan

Discussion Paper

July 2022

STRATEGIC DRIVERS FOR THE AQUACULTURE SECTOR

Guiding Management Principles

General Management Principles

TSIC supports the existing high-level principles used to manage Tasmania's marine resources, including salmon aquaculture. These include but are not limited to:

- Continuous improvement
- Adaptive management
- Robust monitoring at appropriate scales
- Scientific evidence-based decision making
- Transition to clear decision rules and processes (i.e. harvest strategies)
- Stakeholder involvement

TSIC further supports the broader concept of Ecologically Sustainable Development. It is important to understand short and long-term environmental impacts of salmon aquaculture, and define acceptable levels of impact, noting this must be a balance between impact and social and economic benefits derived from salmon aquaculture.

The TSIC Board's accepted balance between socio-economic benefits and marine ecosystem impacts of salmon aquaculture differ to many opponents of salmon aquaculture. It is important to highlight that the small but very vocal opponents to salmon aquaculture appear to have a zero-impact tolerance, and instead appear to be fighting for the removal of salmon aquaculture from Tasmanian waters.

No human activities have zero impact, and the reality of all natural resource extraction or farming industries is there is some level of impact on the environment.

Different stakeholders will have varied tolerances to impact, with some more towards the zero tolerance, and others accepting a level of impact.

TSIC will not accept extreme or irreversible impacts to Tasmania's marine environment.

TSIC will have a balanced approach between environmental impact and social and economic benefits of any industry.

Maintaining a healthy marine ecosystem

TSIC fully supports the maintenance of a healthy Tasmanian marine ecosystem. Without a healthy, diverse, and productive marine environment both now and into the future, Tasmania cannot maximise its economic prosperity from its marine resources. Nor can Tasmanians enjoy the many other amenities provided by our coastal waters.

It is important to acknowledge that salmon aquaculture has the potential to impact the marine environment through the introduction of nutrients. That is why there are rigorous monitoring programs in place to monitor the impact of salmon farming in Tasmania.

TSIC supports the ongoing monitoring of the ecosystem in and around salmon farms to ensure any observed impacts are minimal and acceptable – relative to the social and economic benefits of salmon aquaculture. Where impacts are outside what is accepted within the environmental rules, then TSIC expects action is taken to return the environment to a natural state before farming could be considered in that region again.

It is important to understand that the coastal environment that the salmon aquaculture industry operates in is impacted by a diverse range of influences, many of which have far greater impact on the marine ecosystem compared to salmon aquaculture. For example, freshwater runoff and wastewater; terrestrial sourced pollutants; sewage spills, natural nutrient loading through coastal upwelling; and influence of warming waters due to climate change amongst many more.

It is important that the government consider a whole of catchment / ecosystem connectivity approach to identify and mitigate negative impacts and manage our near coastal marine environment.

A sustainable, resilient, and innovative salmon industry

Marine Spatial Planning as a tool to understanding the needs of other marine users

Tasmania's wild catch fishers and non-salmonid marine farmers have access rights to the Tasmanian marine environment. These rights must be considered during any process to open new water to salmon aquaculture, noting that some Tasmanian fishery jurisdictions extend to 200nM from the Tasmanian coast.

The government should further explore marine spatial planning as a defined process for understanding how different users value the marine environment and how different users may be impacted by marine development.

When considering any new salmon farming locations, the impact on existing commercial seafood operations must be understood and impacts minimised.

TSIC does not support salmon expansion proposals that impact the livelihoods of other commercial seafood users.

Immediate Clarification of Future Salmon Aquaculture Policy

To provide clarity and certainty to both the salmon aquaculture and wild catch fishers / other marine farmers, the Government must clarify their policy around the future direction of salmon aquaculture, with specific reference to future extent of any near-shore, offshore and on-land operations or expansions.

FOCUS THEME: PROTECTION

Building science knowledge

Science underpins all commercial seafood operations in Tasmania. The Tasmanian salmon aquaculture industry is by far the most researched seafood sector in Tasmania, with scientific understanding underpinning regulation and innovation and ensuring the marine environment is protected from unacceptable impacts. TSIC acknowledges that independent scientific advice must continue to inform government, industry, interested stakeholders and the broader community.

It is known internationally that Tasmania is a global centre of excellence for marine science research, with Tasmania home to many world leading researchers, including the field of salmon aquaculture. Their work is independent, peer reviewed and defensible.

Defensible independent science, in balance with socio-economic outcomes, must be the foundation of future of decision making in all seafood sectors.

To ensure consistency and certainty, the process of decision making must be clearly defined within policy, rules and overarching acts.

To support future development and innovation, future research priorities must be carefully considered, and in unison with monitoring environmental credentials, the research must also address the needs of industry and industry development, not just environmental impact.

An important part of any research outcome is to ensure a clear and defensible narrative is available to drive not only decision making but also public debate.

This will require industry, government and research adequately investing in relevant and accessible communication of their work to the broader public.

Governance and Regulations

The Tasmanian salmon aquaculture industry is heavily regulated by the Tasmanian government, with the three salmon companies also complying with various third-party accreditation schemes. TSIC is comfortable with the current regulatory structure for salmon aquaculture, and supports the ongoing review and continual improvement of the rules and regulations as required.

TSIC also supports a planning scheme that takes into account land based and marine based needs to ensure appropriate infrastructure and other needs for successful farming now and into the future.

Circular Economy, Waste and Emissions Reduction

The Tasmanian salmon aquaculture industry has excellent achievement against circular economy and waste reduction. Examples include 100% re-purpose of organic waste from freshwater operations and refining of waste products for fish oil production.

TSIC supports all areas of the Tasmanian seafood industry maximising opportunity for 100% usage of all fish produced, and for the environmentally responsible production of seafood. This includes the phasing out of plastics and poly-boxes for other technologies, as well as the transition towards zero carbon emissions.

FOCUS THEME: PARTICIPATION

Community Engagement

The Government (NRE and EPA), science and industry all have a role to play in community engagement.

Communication must be delivered in a timely manner, be clear and address end user needs. This may require different communication outputs for different demographics.

Return to Tasmanian Community

All Tasmanian seafood sectors provide a return to the Tasmanian community through direct economic return, employment and provision of seafood to Tasmanian's.

Seafood also plays an important role in the Tasmanian Brand, with tourists seeking out fresh, sustainable Tasmanian seafood when visiting Tasmania.

Salmon aquaculture makes significant contribution to Tasmania. An IMAS report shows that in 2018/19, salmon aquaculture contributed $649.6 million Gross Value Added, $361.7 million as household income and employed over 5,000 people[1]. While the 2019-20 Tasmanian Agricultural Score Card puts the Gross Value of Salmonid production at $888 million[2].

Each salmon company provides significant support and sponsorship within the communities they operate in.

These benefits of salmon aquaculture must be considered in the cost recovery debate.

Skills Training and Workforce Development

Core skills and training needs of the Tasmanian seafood industry

Salmon aquaculture provides significant diversity of well-paid employment and career pathway opportunity. Fundamental to many aquaculture and seafood jobs is the need to complete training. The core training needs of salmon aquaculture and the broader seafood and maritime sector is met by the not-for-profit RTO, Seafood and Maritime Training (SMT).

The Tasmanian salmon aquaculture and broader seafood industry does not receive ANY training delivery or benefits from the government funded training provider TasTAFE.

SMT deliver over 200 courses per annum, have up to 2,000 enrolments each year, and currently have more than 250 active trainees. They are an integral part of the Tasmanian seafood and maritime industry and also support a diverse range of seafood community stakeholders.

After several years of funding certainty through the Seafood Pledge, today, the Tasmanian seafood industry has no certainty of government funding to support training needs. Instead,

[1] Economic ContributionTasmanian Key Sectors (2018-2019) REPORT (Aug 2021) - (PDF File 642.8 KB)

[2] https://nre.tas.gov.au/Documents/Tasmanian%20Agri-Food%20ScoreCard%202019-20.pdf

Tasmanian seafood has been forced to compete in the Skills Fund competitive tender process in direct competition with other industries and employers.

In other words, the Tasmanian Government has no guaranteed commitment to support skills and training in the seafood industry.

This is in contrast to the vast majority of other Tasmanian industries, who can access skills and training through the Tasmanian Government's public provider – TasTAFE, which receives a direct financial allocation from the State Government and also benefits from access to Government infrastructure and equipment. Furthermore, TasTAFE can also compete in the Skills Fund tender process in direct competition with the seafood industry.

The Tasmanian salmon and broader seafood industry is therefore significantly disadvantaged compared to other Tasmanian industries that can access skills and training through TasTAFE.

Workforce Development

The Tasmanian Seafood Industry Council has developed and delivered three Seafood Industry Workforce Development Plans in the interest of the Tasmanian industry. As the largest employer in seafood, salmon aquaculture has been a core focus of these plans.

Key outcome and outputs have been:

- Seafood Industry Workforce Profile 2017
- 5-10 Year Strategic Workforce Profile 2017
- The seafood jobs Tasmania portal - https://seafoodjobs.org/
- Career Pathway Maps
- Training Profile 2021
- Next Generation of Workers Report 2021
- Changing the Guard Report 2021

The future salmon and broader seafood workforce would benefit from the development and delivery of another, post-covid workforce plan.

VET in schools

In recent months, TSIC has been working with SMT in a bid to revitalise delivery of VET courses in regional Trade Training Centres at HVTTC. This has been met with a lack of enthusiasm and significant time delays for any decision from within the hierarchy of the Department of Education.

Conclusions

TSIC strongly recommends that the Government:

- Provide confidence to the seafood industry through a budgeted funding allocation to meet the needs of seafood and maritime training demand;
- Support SMT and the seafood industry to rejuvenate the delivery of VET training within key regional Trade Training Centres, most notably the Huon Valley Trade Training Centre.

- Support the development and delivery of a post-covid seafood workforce development plan to support the planning and training of the future seafood industry. This would have a significant focus on the salmon aquaculture needs for offshore farming.

FOCUS THEME: Progress

Research and innovation

Research and innovation are integral to the future of the Tasmanian salmon industry.

TSIC encourages Government, research and industry to continue to build on our knowledge and understanding of the impacts of salmon farming on the marine environment; to continue to explore innovations that reduce these impacts; and to develop new technologies that support the future economic prosperity of industry, in the interests of those employed in the industry and the communities they operate in.

It is important to note that an important part of research is the communication and extension of proposed and current research, and the outcomes / deliverables of completed research.

Industry, government and science need to better understand how to communicate research in a timely manner.

Advanced Manufacturing, Investment and Market Development

Salmon aquaculture is leading the Australian seafood industry with respect to advanced manufacturing, investment and market development.

TSIC strongly encourages industry, with the support of government and research to continue this investment.

Future Production

In the interests of salmon, other marine users and the Tasmanian community, the Tasmanian government need to clearly define their future plans for salmon production, with specific reference to the future of inshore vs offshore vs on land opportunities and policy.