



30/3/2022

Ms Deidre Wilson
Deputy Secretary, NRE Tasmania
Steering Committee Chair

Dear Ms Wilson,

Thank you for the opportunity to comment on the Discussion Paper – A review of the *Living Marine Resources Management Act 1995*.

It is timely for the Act to be reviewed in order to establish a contemporary framework for the sustainable management of living marine resources in Tasmania, commencing with Section 7 of the Act. Perhaps consideration should be given to removal of aquaculture clauses from this Act, given marine farming is already “regulated under multiple pieces of legislation” (pg 13)?

We believe the review could play a role in the Government’s 10 Year Salmon Plan. Aquaculture is working with technology that was not envisaged at the time the Act was last reviewed. Huon Aquaculture is already leading the way in terms of best practice and this review could provide an opportunity to further position Tasmania as a global centre for aquaculture excellence.

Government has an important role to play in setting policy and legislation direction for any industry. It also has a role in creating an economic framework that enables industry growth while also protecting Tasmania’s unique environment. These components are essential if subsequent generations of Tasmanians are to remain living here, moving through the important stages of their personal and professional lives.

Huon has always maintained that the Tasmanian farmed salmon industry warrants reasonable, appropriate policy, regulation and planning that is informed by the best science. We believe the legislation, regulation and processes that underpin our industry are robust and most importantly, backed by science however, we also accept there is always room for strengthening and modernisation.

We encourage the Tasmanian Government to remain contemporary in respect of accessing the best advice and expertise from all over the world to ensure the industry remains viable and sustainable. Innovative industries like the salmon industry are springing up all over Tasmania and this government must ensure its regulatory, policy and social agenda is in step.

We have, and will continue to, work with government and other regulatory authorities. There is no question that every component has an important role to play however, for the future sustainability of the industry it is vital that everyone understands firstly the scope of their role, and secondly works to fulfill the scope of their role.

Specific feedback on discussion questions is outlined below:

- **Benefits (pages 15-16)/Fees, charges and levies (p44)**

In this question, the public resource assumed is Tasmania’s waterways. Aquaculture is Tasmania’s largest primary industry producer and Huon already pays for the use of this public resource through both marine farm licence and lease fees.

Annually, we also make a significant financial contribution to the State in terms of payroll (\$60M+), payroll tax (\$5M+), community grants and we estimate we invest more than \$150M each year in purchasing goods and services from Tasmanian owned and operated companies.

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In addition, Huon will continue to invest (\$250M in past decade) on R&D activities which has included collaboration with Tasmanian and mainland based tertiary science organisations. It is also important to note that the Broadscale Environmental Management Program is funded direct from industry, separate to the various fees.

The industry is currently the only marine farming industry which pays levies to support the EPA and, with the exception of the ShellMAP levy, a government agency (NRE Tas).

We also believe that if returns for the use of public waterways additional to the above are incurred, these should equally apply to other commercial users of public waterways such as commercial and charter fishers and water-based tourism operations. Equally, any increase in levies paid by the industry must result in greater transparency and reporting from the Tasmanian Government on how these funds are used; our collective workforce of thousands of taxpayers would expect nothing less.

Resource sharing (p19)

If the Act is to include provision for resource sharing, it would be critical to the aquaculture industry that workplace safety and biosecurity considerations be prioritised in any arrangements.

Role of science and research (p29)

The current Sustainable Marine Research Collaboration Agreement (SMRCA) doesn't provide adequate support for the sustainable management of Tasmania's living marine resources. The aquaculture industry has very limited input into the research projects funded under this arrangement. Huon, through the TSGA, is well-placed to identify topics that warrant research funding and therefore believes that the industry should be able to submit proposals for research projects.

Consultation on fisheries management (p30)

Tasmanian oysters, scallop, abalone and rock lobster sectors all have certified fishing bodies. While the TSGA is a member of certified fishing body Tasmanian Seafood Industry Council (TSIC), we note that the other sectors have stand-alone status as a certified body in addition to TSIC membership.

Huon supports the TSGA becoming a certified body in line with the certified fishing bodies representing other major Tasmanian commercial fishing sectors.

Advisory committees (p30)

Advisory committees have been established for the abalone, rock lobster, scallops and scalefish sectors. However, the salmon sector does not have an advisory committee, despite being significantly larger than the others. There would be considerable benefit to both the Government and the industry to have this arrangement in place.

We therefore recommend the formation of a formal advisory committee for the salmon industry in line with the advisory committees established for other major Tasmanian commercial fishing sectors and the recreational fishing sector.

Marine farming reporting requirements (p48)

Huon has previously advocated for greater transparency on the reporting of environmental monitoring data, voluntarily reporting a number of datasets for many years. The Tasmanian farmed salmon industry is already subject to a significantly more comprehensive level of reporting than any other similar sector, both nationally and internationally. Any initiatives on reporting should focus on what data is already being reported and how it could be better used to further drive environmental sustainability improvements.

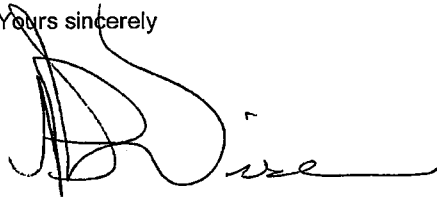
We established a dedicated Compliance Unit some years ago to meet these reporting requirements and have all invested significantly in IT systems to meet reporting obligations; Huon was the first agri-business in the world to establish a real-time Sustainability Dashboard, voluntarily reporting environmental and compliance data.

It is difficult to imagine what further data could be usefully provided. We believe there is widespread public misunderstanding as to the level and detail of data reported by the industry and believe that Government can do more to communicate with stakeholders on the scope of data reported.

In conclusion, we know we have a growing world population and coupled with a decline in wild fish stocks and an enormous amount of ocean the only way we can actually sustainably feed this growing population is through aquaculture.

We encourage the Tasmanian Government to take this opportunity to develop contemporary legislation that recognises the future scope and benefits of aquaculture.

Yours sincerely

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

Philip Wiese

CEO, Huon Aquaculture