

Tasmanian Salmon Growers Association's Submission to the Review of the *Living Marine Resources Management Act 1995*

Thank you for the opportunity to lodge a submission to the Tasmanian Government's Discussion Paper as a first step in the review of the *Living Marine Resources Management Act 1995*.

Introduction

The Tasmanian Salmonid Growers Association (TSGA) is the strong and united peak body representing salmon farmers in Tasmania. At just under one billion dollars in value, the industry is the largest agribusiness in the state. We are also the largest fishery in Australia, producing a sustainable protein which will be important for future global food security.

It's not all about size - we are aiming to be the best *for* Tasmania. The industry directly employs around 2,000 Tasmanians and indirectly supports the jobs of thousands of others who work in the local businesses and suppliers from our extensive supply chain. This employment and economic activity is particularly important in the state's regional and remote communities.

The industry currently pays significant salmon fees and levies to the State Government under the *Living Marine Resources Management Act 1995* (the Act). This includes fees to fund the regulatory work undertaken by the Environment Protection Authority and planning work undertaken by the Department of Natural Resources and Environment Tasmania. In addition to these levies the Tasmanian salmon industry directly funds a significant amount of both compliance and voluntary monitoring.

The TSGA is also expecting to be finalise its formal recognition as a fishery body by the Tasmanian Government in accordance with this Act.

It is timely for the Act to be reviewed, so a contemporary framework for the sustainable management of living marine resources in Tasmania can be established. 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.

Aquaculture and the Living Marine Resources Management Act

While potentially out of scope for this review, the TSGA requests consideration is given to removing aquaculture clauses from this Act, given marine farming is already "regulated under multiple pieces of legislation", as noted in the Discussion Paper (pp 13). For the salmon industry this includes the Marine Farming Planning Act 1995 (MFPA) and the Environmental Protection and Pollution Control Act 1994 (EMPCA).

Such structural legislation reform plays an important role in further positioning Tasmanian as a global centre for aquaculture excellence. This reflects an industry leading the way in terms of best practice and the rapidly evolving technology utilised within industry. For this reason, it is expected adaptive and contemporary legislation review forms an important part of the Government's future-facing 10 Year Salmon Plan.

Specific Comments

1. Objectives and scope

While the Tasmanian salmon industry supports and is committed to the broad intent of the Act's Principles and Objectives, the application of these in the context of the Act is primarily relevant to commercial fisheries.

On that basis, some of the following comments provide a general industry perspective that reflects these broad objectives but are not strictly relevant to the Act.

Benefits (p15)

Aquaculture is Tasmania's largest primary industry producer and industry directly pays for the use of this public resource through both marine farm licence and lease fees, environmental licence fees and through funding compliance activities such as extensive environmental monitoring.

The TSGA members also make a significant financial contribution to Tasmania through its payroll and related expenditure, and more than \$500M used for purchasing goods and services from Tasmanian owned and operated businesses. This contributes to a significant social return, particularly in terms of developing a proud workforce throughout the state.

Incidental, voluntary or compliance activities of the industry provide many benefits for the State, including:

- Marine debris clean ups (salmon waste typically represents around 5 – 10% of materials collected)
- Marine rescues
- Supporting a significant supply chain
- Significant contribution to scientific understanding through extensive monitoring and R&D projects

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.

2. Fisheries Management Framework

Role of science and research (p29)

Research is an integral part of the work of the TSGA and the industry more broadly. It contributes to increased knowledge and understanding of the characteristics and processes of the environment in which the industry operates. It is also important for developing technological advances that not only increase industry efficiency but contribute to its sustainable development.

The Tasmanian Salmon industry has a significant internal research program both funded directly by members and as part of an agreement with the Fisheries Research and Development Corporation.

The industry looks forward to developing a more formal policy addressing TSGA's involvement in externally funded research programs, including the Marine Research Collaboration Agreement (SMRCA).

Consultation on fisheries management (p30)

Most seafood sector peak bodies, including most recently the Commercial Divers Association, are authorised as fishing bodies under the Act. It is recommended that TSGA's



application to become a certified body is approved by the Tasmanian Government, pending the provision of required material.

Advisory committees (p30)

The TSGA recognises a committee or forum to conduct formal engagement offers considerable benefits to both Government and industry. Advisory Committees have been established for most commercial seafood sectors, with terms of reference and functions defined under the Act.

As the management of the Tasmanian salmon industry straddles several pieces of legislation and government departments, the industry believes a formal committee for engagement is necessary, whether it is established under this Act or independently from it.

The oyster industry's Shellfish Market Access Program (ShellMAP) Management Committee with an Independent Chair provides a good model for a formal partnership between industry and government. There are clear safeguards to ensure the integrity of government legislation and its regulatory role is maintained.

3. Regulatory Framework

Fees and Charges (p44)

The industry currently funds compliance work of the Environment Protection Authority and work within the Department of Natural Resources and Environment Tasmanian, through payment of industry levies. These are in addition to the marine farm licence and lease fees and do not include significant compliance monitoring funded directly by industry.

The Tasmanian salmon industry supports greater transparency and reporting from the Tasmanian Government on how these funds are used.

In closing, the TSGA highlights the recent release of the Australian Government's report on the Australian aquaculture sector. This outlines recommendations that would ensure the Tasmania aquaculture sector continues to set international benchmarks if adopted by all levels of government. Any review of legislation managing marine and/or aquaculture operations in Tasmania should be conducted with this Committee's constructive suggestions in mind.

The TSGA looks forward to continuing to engage with the Tasmanian Government as develops its White Paper for release later in the year. The salmon industry is particularly interested in pursuing an approach to consolidating aquaculture management in broader legislative reform.