



## Submission

Draft amendment no. 3 to the Storm Bay off Trumpeter Bay  
North Bruny Island Marine Farming Development Plan

Draft amendment no. 5 to the Tasman Peninsula and  
Norfolk Bay Marine Farming Development Plan

Draft Storm Bay North Marine Farming Development Plan

17 January 2018



## A Coming Together and a Moratorium

Bruny Island has three recognised community organisations covering both North and South Bruny – the Bruny Island Environment Network, Bruny Island Community Association, and Friends of North Bruny. All groups are apolitical and provide a voice for all residents and businesses of Bruny Island on all aspects of Bruny Island life from safety, public access, amenities, resourcing, conservation of natural resources, tourism, economic development, and community engagement.

Although having differing objectives, visions, and geographical extent, the three divergent groups support sustainable marine farming and do not want it to stop. All groups however share the same concerns regarding the proposed massive expansion of Marine Farming in the waters around Bruny Island and in Storm Bay and are demanding:

**a moratorium on expansion of marine farming off Bruny Island and in Storm Bay covering the area identified in the *Sustainable Industry Growth Plan for the Salmon Industry 2018* – if and until an independent sustainable marine farm development plan be developed for the Bruny Island and Storm Bay Bioregion in consultation with and approved by all relevant stakeholders including the community. This plan must form part of a broader plan for the use development and management of resources across the Bruny Bioregion.**



### Lack of Independence and Industry Driven

- The foreword of the plan states that the plan was *Prepared by Petuna Pty Ltd*, yet the plan is labelled *Water and Marine Resources Division Department of Primary Industries, Parks, Water and Environment* and the *Tasmanian Government*. This is extremely confusing, dangerous, and misleading. It clearly implies that a plan written by a private company has already been endorsed by the State Government.
- This suggests a complete lack of independence and capture of Government and governance.
- The process of preparing the plan and placing it out for public consultation, conflicts with the statement within the *Sustainable Industry Growth Plan for the Salmon Industry* of: *A competitive tender process for access to any new farming areas (the “Potential for further release” areas), with criteria for success to be determined by government.*<sup>1</sup>
- The independence of the panel, the Marine Farming Planning Review Panel is also questioned, particularly as the majority of its members are former employees of the marine farming industry or have professional links with the marine farming industry.

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<sup>1</sup> *Sustainable Industry Growth Plan for the Salmon Industry*; Department of Primary Industries, Parks, Water, and Environment; undated p15



### **Lack of Meaningful Consultation and Timing**

- Releasing three uncoordinated Marine Farm Development Plans containing 50 appendices, thousands of pages of documents, studies and reports over the Christmas New Year Period does not constitute any meaningful attempt at consultation.
- The proposed massive expansion of industrial fish farming on the doorstep of the most populated and visited area of Tasmania deserves a significantly greater amount of consultation and social feedback.
- Without meaningful consultation, social division which has been created by the proposed expansion will only intensify and fester, resulting in a devaluation of the Tasmanian and Bruny Island Brands.
- Social division is not only disruptive but also economically and socially damaging to families and communities. The full environmental, social, and economic impacts of these developments have not been considered.
- Regulatory failure means the Tasmanian Government is box ticking applications regardless.





## A Single Consolidated Plan for the Bruny Island Storm Bay Bioregion

- The proposed expansion is piecemeal at best being composed of three separate marine farming development plans prepared by three separate and competing companies.
- For the community to have any confidence in the process there must be one consolidated plan which considers all the potential environmental, social, and economic benefits and costs which might result.
- The development plan must be part of a wider plan that considers all present and futures use, development and management of resources as required by the Tasmanian Resource Management and Planning System.
- Community confidence in regulation of the industry is at an all-time low following the environmental damage which has been done to Macquarie Harbour and the D'Entrecasteaux Channel
- A single consolidated plan would significantly improve monitoring and management as all marine farmers would operate under the same set of rules, management procedures and monitoring protocols.
- The plan would be Government as opposed to industry driven.
- There is nothing within the existing legislative provisions which would prevent the establishment of a single plan for the entire Bruny Island Storm Bay Bioregion.
- We are seeking a single marine farming development plan which covers the bioregion and addresses as a minimum the following matters:
  - Bioregional impacts.
  - Boating traffic - Feed and service vessel traffic in concert with recreational boats, kayaks, jetskis and others.
  - Biosecurity regulation
  - Impact on other existing fisheries - (a) Recreational and (b) Commercial (rock lobster, pelagic/fin fish, oyster, mussel, abalone)



- Ecosystem impacts -including on whale migration, marine and bird life
- Visual impacts
- Noise – farming facilities and servicing boats, day and night
  
- Waste disposal
- Water and sediment quality
- Marine debris and boating safety
- Water access
- Light spill
- Tourism – both land and sea based
- Economic impacts-including on local communities
- Biological - including biodiversity impacts
- Odour and Air quality
- Traffic, access, and parking of land based facilities
- Cultural impacts
- Governance and Legislation
- Predator control
- Monitoring including developing a baseline dataset

### **No limits on expansion**

- Nothing in the plans prevent further expansion and development of marine farming across other areas of Storm Bay and Bruny Island waters.
- This provides no certainty to the community that other areas will not be impacted.
- The current process provides for unlimited expansion particularly as the *Sustainable Industry Growth Plan for the Salmon Industry* identifies all of Storm Bay and an area south of Fluted Cape to Boreel Head as being available for marine farming.
- The Environmental Impact Statement (EIS) states that *the three companies have indicated aspirations for a total production from Storm Bay of 80,000 tonnes per annum*, yet the EIS





contradicts this and states *The Government's intention is that the proposed developments would be managed under an adaptive management framework underpinned by:*

*A staged development approach, with an initial limit on feed input that would provide for approximately 30,000 tonnes of production.*

- This provides no certainty for the community and leaves the door open for an almost further tripling of the number of fish in Storm Bay and the resulting impacts.
- None of these further impacts would be subject to any further community input or consultation as the *Marine Farm Planning Act 1995* only provides for areas and not production.

### **The plans do not provide for 'oceanic' marine farming and are not offshore**

- These leases are not 'offshore', as stated by industry and the Tasmanian Government they are within Storm Bay which is in effect the mouth of the Derwent River.
- This is misleading and obfuscatory and significantly diminishes and underestimates the potential impacts of the proposed expansion as the pens would be visible from the shore, negatively impacting upon views and vistas.
- The proposed expansion is contrary to the commitment expressly stated within the *Sustainable Industry Growth Plan for the Salmon Industry*, which is *A commitment to future expansion moving into oceanic (deeper and high-energy) waters, rather than estuarine waters.*



### No overall environmental impact assessment

- We are deeply concerned that the expansion of industrial finfish farms across Tasmania and within Storm Bay and Bruny Island waters is not properly regulated and all stakeholders are not being included in decision making and serious environmental, social and governance issues are not being addressed.
- This has the potential to cause environmental damage and impact on the island's tourism industry and enjoyment of our home.
- The Environmental Impact Statements do not consider the combined impact of all three-individual marine farm development plans.
- *A Nutrient Dispersion Modelling for Proposed Marine Finfish Farming Zones in Storm Bay* has been undertaken, however, it does not consider the potential impacts that these nutrients may have upon the overall ecosystem and the species within it.
- The proposed adaptive environmental management program has been shown to be flawed in Macquarie Harbour and the community groups have no confidence that introducing a similar program for Bruny Island and Storm Bay will be effective in managing environmental impacts and risks.
- The Marine Farming Planning website states: *In addition, the monitoring program will provide for the development and validation of a biogeochemical model for Storm Bay. The model will estimate natural assimilation of salmonid derived nutrients at varying spatial and temporal scales relative to specific biomass output. This will inform adaptive management by forecasting the potential environmental impacts of salmonid farming in Storm Bay. The model will be developed in collaboration with CSIRO and the University of Tasmania's Institute for Marine and Antarctic Studies (IMAS). Development of the model is expected to commence in conjunction with monitoring.*
- This process is in our view completely back to front.





- A biogeochemical model for Storm Bay must be developed first, only then would it be possible to accurately quantify the potential environmental impacts.
- Serious environmental effects are already being reported on beaches within the D'Entrecasteaux Channel area and are being raised at so called 'Community Consultation' meetings, where the rules are set by the industry and the data supplied by industry.
- The impacts of these ecosystem effects on recreational and commercial shellfish, crayfish and abalone fisheries are unknown.
- Lighting is proposed within the pens. This will result in significant impacts upon flora and fauna (including migratory birdlife) within the areas surrounding the pens, yet these impacts are given cursory consideration in the proposal.
- The rapid expansion of industrial marine traffic in the D'Entrecasteaux Channel and around Dennes Point is now a significant problem particularly the noise, light, and marine debris that these vessels and farms are causing. The Storm Bay expansion will worsen light and noise pollution and marine debris.

### **Recreational fishing and boating**

- Recreational fishing within the Channel has been severely negatively impacted by the existing fish farms the same is likely to result from the proposed expansion.
- Complaints by residents and yachting clubs are increasing with the CYCT recently expressing their list of Marine Safety concerns to the Government.
- Navigating around Bruny Island and Storm Bay would become considerably more difficult.



## Tourism impacts

- Tourism is now the largest employer on the island and the proposed massive industrial marine farming expansion places the sustainability of the industry at serious risk.
- A number of leading tourism operators including Pennicott Wilderness Journeys and John and Susan Wardle, have raised concerns that their businesses will be negatively impacted by the proposed marine farm expansion.
- Prominently positioned industrial marine farming operations and vast number of pens within proximity of the coast will have a serious impact on views, vistas, and amenity – the very experiences which tourists come to enjoy.
- No consideration is given in the plans of the potential impacts of industrial finfish farm expansion on the Bruny Island brand and the tourism experience.
- Tourism Tasmania describes Bruny Island as “some of Tasmania’s most beautifully preserved natural environments, with abundant wildlife and stunning clifftop views.” Bruny Island is one of Tasmania’s premier tourism attractions and it is indisputable that the pristine marine environment is what attracts visitors. The Bruny Island tourism brand is not compatible with industrial aquaculture expansion.
- Sustainable, local produce is also a key selling point for the island, from cheeses to oysters to premium wines. There has been no analysis from government about the impact of industrial salmon expansion on our island’s reputation for clean, green food.
- The government’s approach to planning and licence allocation fails to provide equal importance to environmental, social, and economic considerations. This flaw has not been rectified in the proposed new legislation, the Draft Sustainable Growth Plan for the Salmon Industry. Without an equal balance, a long-term, sustainable industry will not be achieved. Without a social license there is every likelihood that the industry will become the subject of a ‘forestry wars’ scenario.





### Wild oceans, rare species

- The Bruny Island Bioregion has the highest localised level of marine endemism in Tasmania, and probably Australia. It is a hotspot for endemic handfishes, seastars, molluscs and algae. It is home to towering sea cliffs and complex sea caves and has a huge diversity of habitats and spectacular coastal scenery.
- By introducing up to 80,000 tonnes of fish into the bioregion, without detailed modelling of the potential impact this could have upon it, puts at the risk the entire ecosystem.
- While we appreciate the potential economic benefits, the risks to the ecosystem have only been considered at an individual proposed marine farm level as opposed to at a bioregional level.

### Governance failure

- There is currently no 'Storm Bay Area Development Plan' in place even though the industry has requested it and it is essential for industry certification schemes.
- The Tasmanian Government has no sound biosecurity plan. Tasmania is ripe for the kind of major biosecurity crises that have plagued other producing nations like the Faroe Islands. We note that Huon Aquaculture is calling for a new Biosecurity Act. No further industry expansion should occur before this has happened.
- Government continues to fail to require the same planning process for the ocean as it does for land. As with any urban development on a green field site a full plan is required before any area development occurs. This must apply in the water equally. This has not been done for Storm Bay and Bruny Island waters.
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- Government claims that it will listen “to the concerns of the community about where they felt that marine farming was not appropriate, for reasons of amenity and alternative uses.” This claim is repeated in the Draft Sustainable Growth Plan for the Salmon Industry. Yet no clear structure or budget allocation has been provided for community consultation. In Storm Bay, the community has been provided with no useful information beyond company brochures and has been forced to find all details via our own research. We have been presented the development as a *fait accompli*, with no consultation nor modelling of amenity impacts.

### **The solution – a moratorium**

- We are calling on the Tasmanian Government to halt expansion in Storm Bay and in the waters around Bruny Island until governance failures have been addressed. A moratorium will allow all stakeholders to be heard and all impacts of expansion, as part of a broader consideration of all potential uses and their impacts and interactions with the physical and social environment to be investigated in detail, through an independent process and deliver recommendations for an industry based on a sustainable, considered, and agreed future.

*This process must:*

- Involve all Storm Bay and Bruny Island communities and stakeholders.
- Set clear actions, targets, objectives, and outcomes to drive and guide the short, medium, and long-term management of the industry.



- Produce an agreement that is then enshrined in a formal Bruny Island-Storm Bay Area Development Plan.

**The final Storm Bay Development Plan must be agreed by all stakeholders and include:**

- Bioregional- including biodiversity-impacts
- Limits on boating traffic
- Biosecurity regulation
- Limits on expansion that will negatively impact recreational, and commercial rock lobster and abalone, scale fish, oyster and mussel fisheries
- Standards for visual and amenity impacts
- Requirements for economic impact modelling, including impacts on other businesses such as tourism
- Requirements for modelling of cultural impacts
- Limits for noise, light, and odour impacts
- Limits on waste and requirements for waste disposal
- Water and sediment quality triggers
- Limits on benthic faunal impacts
- Impacts on marine and terrestrial fauna and flora, including rare and endangered species.
- Triggers to prevent the risk of toxic algal blooms
- Requirements to publicly release baseline data and the results of monitoring in line with baseline data.
- Limits on marine debris
- Requirements for predator control
- Limits on fresh water use in drought conditions
- The waters around Bruny Island, including Storm Bay





## Who Are We

### **Bruny Island Community Association (BICA)**

**The basic objects of the Association are: -**

- To maintain and develop the quality of life on Bruny Island.
- To preserve the important elements of the special character of Bruny Island.
- To ensure that any development of or alteration to the attributes and qualities of the Island contribute in a positive way to the enhancement of its character.

### **Bruny Island Environment Network (BIEN)**

The Bruny Island Environment Network Inc. was established in January 2009. We are a network of individuals and groups with an interest in the conservation of the natural resources and biodiversity of Bruny Island, Tasmania, Australia. The aims and purpose of the network are to:

1. Promote the biodiversity, cultural heritage and scenic values of Bruny Island and generate resources and support for their protection.
2. Support economic activity on Bruny that is ecologically sustainable, generates sustainable livelihoods on the island and enhances its values.
3. Provide information and support for landholders, the wider Bruny community, and visitors about environmental and conservation issues.
4. Work with private and public landholders to improve environmental outcomes:

### **Friends of North Bruny (FONB)**

The overarching objectives of FONB are:

- to promote low impact (environmental, social, cultural) and high-quality projects that benefit both the environment and people of North Bruny.
- to act as stewards for the protection and preservation of the unique North Bruny environment and it's lifestyle for current and future generations.