



tasmanian conservation trust inc

Secretary
DPIPWE
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DRAFT AMENDMENT NO.3 TO THE D'ENTRECASTEAUX CHANNEL MARINE FARMING DEVELOPMENT PLAN FEBRUARY 2002

Thank you for the opportunity to comment on Draft Amendment No.3 to the D'Entrecasteaux Channel Marine Farming Development Plan.

There is some uncertainty relating to the extent and location of the proposed changes due to an apparent typo relating to Figure 2 where the caption reads "*Location of 30 bay grid (grey circles) within proposed expanded lease area (black solid line) and Zone (black hashed line)*". In fact there is no black hashed line on the map. The only hashed line is red in the PDF document. Does this mean we are to take the area as being the red hashed line or has the black hashed line been omitted? Other figures may indicate that this interpretation is the case, but clarity and certainty about proposed changes is fundamental to any planning process and associated consultation.

The statement that it may be necessary to kill seals to protect people is completely unnecessary. Australian fur seals and New Zealand fur seals in the natural marine environment provide no significant threat to humans in Tasmanian waters. If equipment, protocols and training of employees are adequate there should be no expectation that seals would become a threat or that there would be any need to kill these protected animals. The Pacific North West Coast of both the USA and Canada provide examples of how seals can be managed effectively without killing them.

Wherever the expansion is actually planned to occur in this part of the D'Entrecasteaux Channel, it is clear that this proposal will have an impact on public amenity. The area is used for recreational boating, sailing, diving and fishing. Fishing activities in this area include trolling, bottom fishing and diving. Targeted species include scallops, flathead, Australian salmon, squid and other species. Diverse marine benthic habitats, including an area of reef, occurs in the vicinity of the proposed expansion. Nearby Roberts Point has been identified as

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having important biodiversity values, most recently during the RPDCs Bruny Bioregion MPA Inquiry. The proposal does not adequately demonstrate that these habitats will be protected from pollution from the marine farm expansion. In addition, any further expansion of the aquaculture industry in this area will interfere with fishing and other traditional activities, and may also damage biodiversity and other natural values.

The impact of fin fish cages on the marine environment includes the release of faeces and other organic pollutants into adjacent areas, as well as antibiotics and antifoulants if these are being used. Physical smothering of benthic habitats by solid wastes, chemical contamination and eutrophication are of concern.

Antibiotics have been detected in wild caught fish from the D'Entrecasteaux Channel with levels of antibiotics exceeding those permitted by Australian Standards. Even ignoring the wider issues surrounding the use of antibiotics in food animals, the contamination of wild fish is unacceptable.

The CSIRO study of the Huon indicates that Aquaculture contributes around 25% of total nutrient loading (human related inputs make up about 50% of the total). The ecological consequences are not completely understood, particularly with regard to benthic communities, but in any case present a threat to the aquaculture industry itself as raised nutrient levels can encourage blooms of toxic dinoflagellates, for example.

The Tasmanian Conservation Trust (TCT) remains concerned that the planning process for the aquaculture industry is quarantined from mainstream planning processes in Tasmania, along with Forestry and Mining. Claims by the aquaculture industry that there will be major expansion are of concern, particularly when issues with pollution from faeces, nutrients, antibiotics etc., the loss of amenity and an inadequate planning process have not been addressed.

With regard to this particular amendment, important concerns are not adequately addressed and the proposal to increase the area used for aquaculture in this instance should be rejected. Evidence should be provided to demonstrate that concerns about loss of amenity and pollution of the marine environment are either not significant or can be dealt with effectively.

The amenity issue is of particular concern. The TCT believes that the aquaculture industry in the D'Entrecasteaux Channel has already had an impact on amenity and that it is difficult to see how the area used by this industry can be expanded with causing unacceptable damage to amenity. It is time for a more strategic approach to aquaculture planning to be developed. Government should provide a clear indication how much more of Tasmania's marine environment will be given to the aquaculture industry, and in the case of the D'Entrecasteaux Channel in particular, how problems associated with eutrophication can be avoided. It is also time for aquaculture planning to be incorporated into Tasmania's mainstream planning processes so that they are subject to the same scrutiny and checks and balances of most other Tasmanian businesses.

Yours sincerely

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