


20/12/2024 08:27:00 AM

Mr Luke Martin
83 Salamanca Place
BATTERY POINT
TAS 7004
AU

 @salmontas.au

PM Correspondence - ATT:154862 Salmon Tasmania correspondence re Macquarie Harbour

Please find attached correspondence to the Prime Minister from the Chief Executive's of Tasmania's three salmon aquaculture companies.

20 December 2024

The Hon Anthony Albanese MP
Prime Minister of Australia
Parliament House
Canberra ACT 2600

Dear Prime Minister,

RE: Certainty for Macquarie Harbour Salmon Aquaculture Industry

We write as the Chief Executives of Tasmania's three salmon companies - Petuna Seafood, Tassal Group and JBS Huon Aquaculture – who all farm in Macquarie Harbour, on Tasmania's West Coast.

We thank-you for your visit to Strahan on the weekend and acknowledge your ongoing public support for the salmon farming industry and those whose livelihoods depend on it.

As you saw first-hand at the community Christmas event, keeping local jobs on the West Coast is critical to these communities and the present uncertainty is impacting not only our employees but local businesses, schools and wider economic activity across the region.

As you are aware, the Department of Climate Change, Energy, Environment and Water (DCCEEW) is still considering requests for the reconsideration of the 2012 decision that our operations in Macquarie Harbour are not a Controlled Action if undertaken in a particular manner (NCA/PM) and is still preparing advice and recommendations to the Minister for the Environment and Water (Minister).

Together, as an industry, we are asking you as Prime Minister to help end this uncertainty and to support the replacement of the current NCA/PM decision with an updated and contemporary NCA/PM decision. This is the right outcome on the basis of science and importantly will end the uncertainty for families and businesses across North-West Tasmania.

An updated NCA-PM for Operations in Macquarie Harbour

We propose that a new NCA-PM decision could include requirements for operators in Macquarie Harbour to produce:

1. Dissolved oxygen consumption reports to measure how the dissolved oxygen consumption is changing over time in the Harbour;
2. A dissolved oxygen mitigation plan to outline how the dissolved oxygen consumption generated can be offset or reduced by operators; and
3. A continuous water quality monitoring plan, which requires operators to measure changes to water quality to monitor the effectiveness of the mitigation plan.

Requiring the operators to adhere to these additional conditions would modernise and upgrade the conditions imposed by the 2012 decision by then Minister for the Environment, Tony Burke MP, and

address concerns raised recently about the alleged impact of our operations on dissolved oxygen levels within the harbour and the environment for the Maugean Skate.

Importantly, these additional stringent conditions would align the EPBC Act decision with the conditions now imposed on operations by the Tasmanian Environment Protection Authority (Tasmanian EPA) through its environmental licence conditioning (renewed in November 2023).

We wrote to Minister Plibersek on 6 November 2024, proposing this pathway forward and asked that the Minister consider all information put forward by Salmon Tasmania, the Tasmanian Government and the Tasmanian EPA, which ultimately supports reaching a conclusion that a NCA-PM decision remains the appropriate authorisation for Macquarie Harbour. We are yet to receive a response to this correspondence.

No grounds for revoking the existing NCA/PM

Our position is supported by the fact the environmental licencing requirements now imposed by the Tasmanian EPA are working; with scientists finding a clear trend of improving oxygen levels in Macquarie Harbour since their imposition. As a result, two thirds of Macquarie Harbour has now returned to the same oxygenation levels recorded between 1993-2010 and Tasmanian EPA monitoring data shows the conditions in the Harbour are now at their best level in over a decade. Scientific evidence has also shown the Maugean Skate juvenile population has stabilised.

These positive developments will also benefit from the funding your Government recently committed to future oxygenation efforts in the Harbour that builds upon the extensive work our companies are also undertaking through the Macquarie Harbour Oxygenation Project.

It is also important to recognise through the steps voluntarily taken by industry and under the regulatory direction of the Tasmanian EPA, permitted salmon aquaculture production levels in the harbour are less today than when our NCA/PM approval was granted in 2012.

The alternative to what we are proposing is for the Minister to take the extraordinary step of replacing our existing 2012 NCA/PM decision and making a decision that our operations within the Harbour are a 'Controlled Action' (CA).

This would require our companies to initiate the long, uncertain and highly contentious process to seek EPBC Act approval if we wish to remain operating in the Harbour. Further, the operation of the EPBC Act would require us to immediately cease all operations that are part of the CA, while the assessment and approval process is being undertaken. A process which will take years.

There have also been media reports the Federal Government is still exploring the potential for the Minister to initiate her powers to issue a 'National Interest Exemption' to enable the industry to continue to farm and manage our livestock at some level while seeking EPBC Act approval.

We must be clear - we do not see these options as a genuine solution for the industry or the community. Indeed, they pose considerable risk to both the industry and the Government and will not provide the certainty local communities are seeking.

A CA decision – even with a National Interest Exemption – will mean a protracted period of ongoing uncertainty and debate around our operations in Macquarie Harbour. They are outcomes that will be

quickly weaponised by well-funded and aggressive activist organisations pressuring our consumers, retailers and certification bodies. They will also inevitably use that decision as an opportunity to spread further misinformation and cast doubt in the community about the sustainability of our operations in other parts of Tasmania. Such decisions would also establish a major precedent that will undermine investment confidence in our industry, and other established industries across Australia relying on EPBC Act approvals or decisions.

Government Support Must Translate into Action and Certainty for the West Coast

We are encouraged by the bi-partisan support our industry has received from the Tasmanian Government and Dean Winter MP, Leader of the Opposition, and federally from you, many of your colleagues and the Coalition. This issue should not be about politics, it is about making rational decisions based on clear science and striking a balance between environmental management and supporting the jobs and industries of regional communities.

But this support must translate into action and certainty for hundreds of families worried about their livelihoods.

The reconsideration request process commenced over 12 months ago. With an election looming, we are calling on you as Prime Minister to urgently back West Coast communities and families you have met recently, by supporting an updated NCA-PM decision.

We would welcome the opportunity to further discuss this with you or your representatives in the coming days.

Yours sincerely,

s 22(1)(a)(ii)

Doug Paulin
Managing Director
Petuna Sealord

s 22(1)(a)(ii)

Mark Ryan
CEO & Managing Director
TASSAL Group

s 22(1)(a)(ii)

Henry Batista
CEO & Managing Director
JBS Huon Aquaculture

Cc:

Tim Gartrell, Chief of Staff to the Prime Minister
Hon Julie Collins MP, Minister for Fisheries
Tasmanian Federal Parliamentary Labor Party Members
Hon Jeremy Rockliff MP, Premier of Tasmania
Dean Winter MP, Tasmanian Labor Leader

20/02/2025 12:25:00 PM

Mr Luke Martin
83 Salamanca Place
BATTERY POINT
TAS 7004
AU

§ 22(1)(a)(ii)

@salmontas.au

PM Correspondence - ATT:175542 Tasmanian Salmon Industry - Response to PM
Correspondence

Please see attached correspondence to the PM, responding to his letter to the industry
received on 15 February 2025.

20 February 2025

The Hon Anthony Albanese MP
Prime Minister of Australia
Parliament House
Canberra ACT 2600

Dear Prime Minister,

RE: Certainty for Macquarie Harbour Salmon Aquaculture Operations

Thank you for your letter dated 15 February 2025 in relation to the salmon farming industry in Macquarie Harbour. As the Chief Executives of Tasmania's three salmon companies - Petuna Seafood, Tassal Group and JBS Huon Aquaculture, we want to affirm our great appreciation of your ongoing public support for the continuation of salmon farming in Macquarie Harbour and for those whose livelihoods depend on it.

Our position has been and remains that scientific data supports the continued operation of the industry in Macquarie Harbour and that, based upon scientific evidence, the requests made by others for Minister Plibersek to reconsider the 3 October 2012 NCA-PM EPBC Act decision (and replace the decision with a 'controlled action' decision) do not establish the relevant statutory grounds and cannot be supported. There is neither substantial new information nor a substantial change in circumstances since the date of the NCA-PM EPBC Act decision relating to impacts of salmon farming activities on the Maugean skate. Salmon Tasmania has written to the Minister expressing this position.

Salmon Tasmania and the operators remain confident that, having regard to the science and all information before her, Minister Plibersek should reach a conclusion that an NCA-PM decision remains the appropriate authorisation for salmon farming activities in Macquarie Harbour, and do so prior to the Federal Election.

Your letter refers to the recent IMAS and University of Tasmania Report 2014-2024 Macquarie Harbour Maugean skate population status and monitoring report dated 13 February 2025 (IMAS Report), which highlights that recent surveys of the Maugean skate population confirm the population in the harbour and surrounds is now comparable to population levels in 2014 arising from, amongst other things, an improvement in dissolved oxygen levels within the harbour.

The latest available science reported in the IMAS Report only strengthens our longstanding position that the environmental licensing requirements already imposed on the operators by the Tasmanian Government, and the innovative technologies and engineering solutions that have already been implemented to address dissolved oxygen levels within the harbour, are effective. However, we are of the view that the salmon industry is not the sole contributor to the environmental conditions within Macquarie Harbour and there should also be consideration by the Federal and State Governments of all relevant factors affecting water quality and ensuring the relevant companies and Government entities contribute to the improvement of oxygen conditions in the Harbour.

We believe the EPBC reconsideration requests can and should be brought to conclusion immediately by rejecting the requests. We are extremely concerned about:

- the significant period of time that the reconsideration requests have remained on foot without a decision; and
- the continued misinformation being spread about the industry and the doubt cast in the community regarding our operations.

Should the decision on the requests not be immediate, we welcome your proposal for special legislation to secure the certainty desperately needed for the industry.

We are ready, willing and able to lend any support necessary for the Bill to be put before Parliament and request this occurs urgently, prior to calling the Federal election. We also request to be consulted on the proposed content and wording of the Bill as part of the drafting process, and commit to providing swift feedback and input for Government, to enable the passage of the Bill prior to the end of this term of the Parliament.

Again, we appreciate your ongoing support for the industry and look forward to discussing the proposed Bill with you or your representatives soon.

Yours sincerely,

s 22(1)(a)(ii)

Doug Paulin
Managing Director
Petuna Sealord

s 22(1)(a)(ii)

Mark Ryan
CEO & Managing Director
TASSAL Group

s 22(1)(a)(ii)

Henrique Batista
CEO & Managing Director
Huon Aquaculture

Cc:
Hon Julie Collins MP, Minister for Fisheries
Tim Gartrell, Chief of Staff to the Prime Minister
Tasmanian Federal Parliamentary Labor Party Members
Dean Winter MP, Tasmanian Labor Leader

From: s 22(1)(a)(ii) @salmontas.au>
Sent: Thursday, 20 February 2025 12:22 PM
To: Albanese, Anthony (MP) <A.Albanese.MP@aph.gov.au>
Cc: julie.collins.mp@aph.gov.au; s 22(1)(a)(ii)@aff.gov.au; s 22(1)(a)(ii) @pm.gov.au>;
s 22(1)(a)(ii) @pm.gov.au>
Subject: Macquarie Harbour - Tasmanian Salmon Aquaculture Industry

Good afternoon,

Please find attached correspondence for the Prime Minister regarding the Tasmanian salmon industry's operations in Macquarie Harbour, Tasmania, responding to his correspondence to the Tasmanian salmon industry, received on 15 February 2025.

Any concerns, or questions, please do not hesitate to reach out.

Luke Martin - s 22(1)(a)(ii)



20 February 2025

The Hon Anthony Albanese MP
Prime Minister of Australia
Parliament House
Canberra ACT 2600

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