Palawa Submission on the proposed Bass Strait fish farm expansion

October 2026

Aboriginal Land Council Tasmania

Tasmanian Aboriginal Centre

Submission on EPBC 2026/10627

Aquaculture research in the Bass Strait Blue Economy Zone: stocking salmon and cultivating seaweed

Submitted by the

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Summary

The Palawa [Tasmanian Aboriginal] community submits that significant information is missing from Blue Economy CRC's preliminary documentation. That information must be provided to Aboriginal people, the wider community and the Minister for the Environment, Murray Watt MP, before the proposal can be properly assessed.

The proposal is presented as research into ocean food production. Yet the preliminary documentation does not adequately explain:

- who the resulting food is intended to feed or whether it will be accessible to people experiencing food insecurity;
- how the 55,000 salmon will themselves be fed;
- where the ingredients of that feed will come from;
- what impacts feed production may have on other fisheries and marine communities;
- how feed and fish waste will affect Bass Strait;
- how the proposal could affect culturally important species, particularly yula / mutton bird / short-tailed shearwater;
- how it may affect Aboriginal cultural foods, cultural practices and food sovereignty; or
- what cumulative impacts could arise if this near-commercial trial facilitates further open-net salmon farming in Bass Strait.

Bass Strait is Aboriginal Sea Country. It is a living cultural landscape that connects its waters and islands with Aboriginal communities, culturally important species, food systems and generations of knowledge and practice. It is not an empty space available for industrial experimentation.

The health of Aboriginal people, culture and food systems is indivisible from the health of Country. The proposal should therefore not be approved without a comprehensive environmental assessment and an independent Aboriginal cultural values and Sea Country impact assessment developed with Tasmanian Aboriginal people.

1. muka milaythina / sea country

Our connection to Bass Strait is ancient, enduring and inseparable from who we are as Palawa people. Palawa people's relationship with this Sea Country did not begin with colonial records, archaeological discoveries or scientific recognition. We have always belonged to this Country. Our knowledge, cultural practices, responsibilities and identities have been shaped by our relationship with these waters since the beginning of time.

For Palawa people whose families and communities are connected to the islands and coastlines of what is now known as Bass Strait, the sea is not simply a place where we live, work or gather food. It is who we are. Our Sea Country holds our identity, our history, our cultural knowledge and our obligations to the generations who came before us and those yet to come.

Palawa women have gathered shells and shellfish from the intertidal zones of Bass Strait since time immemorial. These practices are not relics of a distant past. They represent an enduring relationship with the tides, coastlines, marine species and seasonal changes of our Country. The knowledge required to gather sustainably, understand marine environments and pass cultural practices between generations is living knowledge. It continues to connect Palawa women to their ancestors, their families and their Sea Country.

Yula (mutton bird) harvesting is another fundamental expression of this connection. For generations, yula has provided food, supported livelihoods and sustained cultural practices, collective work and knowledge sharing. Muttonbirding has been central to Palawa self-determination, enabling families to maintain cultural and economic relationships with the islands of Bass Strait. It is not simply a commercial activity or a seasonal harvest. It is a cultural practice, an expression of identity and a continuing responsibility to Country.

These relationships have endured despite colonisation, dispossession and government policies that displaced Palawa families from islands their ancestors had occupied, cared for and depended upon. Colonial land allocation, leasing and private acquisition restricted access to Country and disrupted cultural practices. Yet our connection survived. Our people continued to return, harvest, teach, gather and maintain relationships with the islands and waters that remain fundamental to our identity.

This history must inform decisions about the future of Bass Strait.

The proposed expansion of industrial fish farming cannot be considered solely through the lens of commercial opportunity, environmental management or economic development. It must also be considered in the context of Palawa cultural authority, our

continuing connection to Sea Country, and the historical exclusion of our people from decisions affecting our ancestral lands and waters.

Bass Strait is a living cultural landscape. Its marine ecosystems sustain the species, habitats and seasonal relationships upon which our cultural practices depend. Industrial development that affects marine environments, access to harvesting areas, water quality, marine species or the ecological relationships that sustain yula and other traditional food sources has the potential to cause impacts that extend well beyond the immediate footprint of a fish farm.

For Palawa people, damage to Sea Country is not simply an environmental loss. It can disrupt cultural practices, diminish opportunities to pass knowledge to younger generations, undermine livelihoods and self-determination, and harm the relationships that sustain our communities.

We cannot separate the health of Bass Strait from the cultural, social and economic wellbeing of the Palawa people whose lives and identities remain connected to it.

The Palawa community developed a ground-breaking new Indigenous Protected Area in the north-east of Lutruwita / Tasmania, called Tayaritja Wukalina milaythina muka.

This proposal would establish the State's first land-and-Sea-Country Indigenous Protected Area and contains compelling evidence of Palawa ownership of, and enduring relationships with, Lutruwita / Tasmania's marine environment.

This includes the millennia-long ownership of the land bridge between Lutruwita / Tasmania and the mainland continent. Please read more about this here: https://thelandbridge.au/

2. Kipli / food

> "We will see a future where ocean food production has the capacity to feed us here at home, across Australia and indeed around the world."
>
> *- Tasmanian Salmon Industry Plan 2023*

Kipli is the palawa kani word for food. Food is nominally the purpose of aquaculture, although there is an open question as to whether the central purpose of industrial aquaculture is to feed people or to generate profit through the production and sale of food.

Before invasion and colonisation, Palawa people were sustained by abundant food resources underpinned by healthy Country and functioning ecosystems. Colonisation dispossessed our people of land and Sea Country, restricted access to traditional foods

and disrupted the cultural knowledge, practices and relationships through which food was obtained, shared and cared for.

Lutruwita / Tasmania now has more than 600 threatened, endangered or declining plant and animal species. This ecological decline exists alongside the continuing social and economic consequences of dispossession.

Aboriginal people are fighting back and rebuilding our nationhood. Nevertheless, our people continue to experience profound intergenerational disadvantage, including food insecurity. This is why we begin this submission with the fundamental issue of kipli.

In 2022–23, the Australian Bureau of Statistics reported that 41 per cent of Aboriginal and Torres Strait Islander households nationally experienced food insecurity because of insufficient money for food at some point during the preceding 12 months.

By comparison, the ABS found that 13.2 per cent of Australian households overall experienced food insecurity due to a lack of money in 2023. While the figures were produced through different ABS survey processes and do not provide a Tasmania-specific comparison, they demonstrate a stark national disparity.

Food insecurity has also become a serious problem across Lutruwita / Tasmania.

University of Tasmania research estimated that food insecurity rose from approximately 6 per cent before the COVID-19 pandemic to 26 per cent during the first lockdown period. It was subsequently measured at 20 per cent in September 2020 and 23 per cent in May 2021.

Foodbank reporting also indicates persistent and substantial food insecurity in Tasmania, with regional households experiencing particularly high rates. Recent reporting based on Foodbank data estimated that approximately one-third of Tasmanian households, or around 81,000 households, experienced food insecurity in 2025.

Food insecurity is broader than going hungry. It includes being unable to afford sufficient nutritious food and may result in people reducing portion sizes, choosing lower-quality food, skipping meals or going without food altogether.

Over a comparable period, Tasmanian salmon production has grown substantially.

Tasmanian Government annual reports record salmon production increasing from 47,184 tonnes in 2014–15 to 77,948 tonnes in 2021–22, an increase of approximately 65 per cent. Production peaked at 83,056 tonnes in 2020–21 before falling. More recent figures from the Tasmanian Salmon Farming Data Portal record head-on, gutted production of 69,979 tonnes in 2023–24, 67,984 tonnes in 2024–25 and 74,249 tonnes in 2025–26.

These figures do not demonstrate a simple causal relationship between salmon production and household food insecurity. They do, however, expose an important

contradiction: producing an increasing volume of a high-value food does not ensure that people experiencing poverty can afford to eat well, even in the jurisdiction in which it's produced.

Farmed salmon remains unaffordable for many people on low incomes. The expansion of salmon farming should not therefore be characterised as responding to food insecurity without evidence that its products will be accessible to the people experiencing that insecurity.

Food production must also be considered in terms of what it displaces, consumes and places at risk. A system that produces a commercially valuable food while imposing risks on culturally important species, Aboriginal food practices, wild fisheries and Aboriginal Sea Country cannot be assessed simply by counting the tonnes of salmon produced.

For Palawa people, food security includes continuing access to healthy Country, cultural foods, fishing, harvesting, food sharing and the ecological knowledge through which these practices are sustained. It also includes the authority to participate in decisions about activities that may affect those systems.

This is a question not only of food security, but of Aboriginal food sovereignty.

3. kipli pinungana / fish food

Extending the food question from people to pinungana / fish, the preliminary documentation provides little meaningful information about how the proposed 55,000 Atlantic salmon will be fed or about the source and composition of their feed. This is a significant omission.

Feed is a major material input into intensive salmon farming. Its quantity, composition, digestibility and method of delivery are directly relevant to the volume of nutrients and organic waste entering the surrounding waters.

The proponent should be required to disclose:

1. the feeding system and measures used to detect and prevent overfeeding;
2. estimated total feed consumption over the life of the trial;
3. the anticipated feed-conversion ratio and the assumptions underlying that estimate;
4. expected feed losses and the quantity and dispersal of uneaten feed;
5. the ingredients and nutritional composition of the feed;
6. the proportion and origin of fishmeal and fish oil;

7. whether feed ingredients will be derived from wild-caught fish;
8. the species, fisheries and geographic regions from which marine ingredients will be sourced;
9. certification, sustainability and traceability arrangements;
10. the use of terrestrial animal products, agricultural ingredients, additives, colourants or therapeutic substances; and
11. contaminant testing and biosecurity controls.

The environmental consequences of the proposed action should not be confined to effects that occur immediately around the salmon pen.

If the trial depends upon fishmeal or fish oil produced from wild-caught fish, the proponent should identify the species and fisheries involved and assess the implications for those marine ecosystems and the communities that depend upon them. The removal of wild fish from one marine food system to support the intensive production of farmed salmon in another is not environmentally neutral.

Feed inputs are also directly relevant to the projected nutrient and organic load released into Bass Strait. Without information about total feed quantities, feed composition, digestibility, feed conversion and expected wastage, the public and the decision-maker cannot reliably assess effects on water quality, seabed conditions, marine food webs or culturally significant Sea Country.

The proposal would increase stocking from 15,000 salmon in the earlier trial to 55,000 salmon, with an estimated harvest biomass of approximately 302 tonnes. Findings from the earlier, lower-density trial cannot simply be assumed to establish that feeding-related effects will remain acceptable at a near-commercial stocking density.

Published estimates of the quantity of wild fish used to produce feed for farmed salmon vary considerably, including estimates ranging from about 0.7 kg to 1.9 kg of wild fish inputs per kilogram of farmed salmon. The proponent should disclose the project-specific fish-in, fish-out ratio, the source data and methodology used, and how risks to source fisheries and marine food webs will be avoided.

4. Yula / short-tailed shearwater

The Palawa harvest of yula / mutton bird / *Ardenna tenuirostris* is one of the world's longest-continuing Indigenous food-harvesting traditions and cultural practices.

The importance of yula and the yula harvest to Palawa identity, family life, autonomy and cultural continuity is immense. The season brings families together on the islands,

supports the transfer of knowledge between generations and remains a powerful expression of Palawa survival, resistance, community and self-determination.

Yula is also an important cultural food and source of protein. Its value cannot be measured solely through the size or profitability of the commercial harvest.

Available information indicates that:

- commercial operators harvest and sell approximately 200,000 chicks in a typical year, although a current dollar value for that activity is not publicly available;
- reporting from 2018 identified commercial sheds operating on Babel, Chappell, Big Dog and Trefoil islands, while also indicating that returns to harvesters could be modest;
- NRE Tasmania recorded 519 non-commercial licences and 12,658 birds reported taken in 2024, noting that these figures do not capture the commercial harvest or the full extent and value of cultural harvesting; and
- Australian and Tasmanian government materials recognise muttonbirding as a source of nutritious seasonal food and income and as an enduring Aboriginal cultural and economic activity.

The lack of information about salmon feed is particularly concerning in this context.

Yula feed on krill, fish, squid and other marine organisms. Their survival and reproductive success depend upon functioning marine food webs. If salmon feed contains fishmeal or fish oil made from wild-caught fish, the sourcing of that feed may also connect the proposal to pressure on marine species and food webs beyond the immediate trial site.

The significance of yula cannot be reduced to whether the proposal will physically disturb a breeding rookery. Yula spend much of their lives at sea. Their cultural and ecological significance extends across feeding areas, migration routes, breeding islands and the Sea Country that sustains them.

The preliminary documentation does not contain an adequate assessment of possible effects on yula as a culturally important species. Nor does it adequately assess whether changes to water quality, prey availability, marine ecological conditions, artificial lighting, vessel movements, infrastructure, feed inputs or the cumulative industrialisation of Bass Strait could affect yula or Aboriginal relationships with the species.

We do not assert, without the necessary scientific investigation, that this trial will necessarily produce a measurable decline in the yula population. Our concern is that the proponent has not conducted the cultural and ecosystem-level assessment necessary to demonstrate that serious or irreversible harm is unlikely. The

precautionary principle does not require impacts to be assumed; it requires protective measures not to be postponed merely because full scientific certainty is lacking where there is a threat of serious or irreversible environmental damage.

Yula is a listed marine and migratory species under the EPBC Act and therefore attracts additional statutory protection.

Australia's Wildlife Conservation Plan for Seabirds (2022) lists pressures that the species is under, including light pollution.

The 2019 draft seabird plan referred to possible adverse consequences of aquaculture, including risks associated with bacteriological discharges where pathogen concentrations are high. Although this wording was not carried into the final 2022 plan, the underlying disease and pathogen pathways still require project-specific assessment.

The Tasmanian Aboriginal Centre (TAC) Pakana Rangers have been using GPS loggers and depth sensors to improve knowledge of critical habitat, during yula chick season.

This work has been undertaken in Tayaritja / Furneaux Islands in northeastern Bass Strait. The results indicate that Bass Strait is critical to the protection of chick provisioning foraging habitat.

Accordingly, expansion of fish farming in Bass Strait has the potential to affect yula, a listed migratory and marine species, and the Commonwealth marine environment, both of which are protected matters under the EPBC Act.

The EPBC assessment must therefore consider not only direct ecological effects on yula, but also the resulting effects on the living cultural heritage values, food practices and Sea Country relationships of the Palawa community.

As such an expansion of fish farming in Bass Strait has the potential to have a significant impact on yula which are a listed migratory species and the Commonwealth marine area, which are Matters of National Environmental Significance protected under the *Environment Protection and Biodiversity Conservation Act* (EPBC Act).

As such environmental assessment of the proposed activity under the EPBC is required, and such assessment must consider the living cultural heritage values of the Palawa community. Any impacts on yula have impacts on the living cultural heritage values of the Palawa community.

The Palawa community is deeply concerned about how the arrival of bird flu in Tasmania could impact yula populations, the yula / mutton bird economy and one of the few opportunities the Palawa community have of economic and cultural self-determination and celebration. We understand that experts consider the arrival of H5 avian influenza as inevitable.

We note that section 391(2) of the EPBC Act says that "*lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage*".

We therefore submit that the Minister must apply the precautionary principle when considering cumulative threats to yula, including the proposal's disease, lighting, food-web and habitat risks in the context of the uncertain future effects of H5 avian influenza. The submission should avoid suggesting that the proposal will cause or spread avian influenza unless evidence establishes such a pathway.

5. Aboriginal connections to Bass Strait Sea Country

Tasmanian Aboriginal connections to Bass Strait are ancient, continuing and inseparable from the marine environment.

Archaeological evidence considered by Irynej Skira records Aboriginal occupation of Hunter Island dating back approximately 23,000 years. Skira also documents Aboriginal use of coastal and island resources, including seabirds, seals, shellfish and other marine species. Aboriginal people travelled to islands, maintained detailed knowledge of seasonal ecological changes and used marine resources as part of a broader cultural economy.

Following colonisation, Aboriginal women and their descendants established enduring communities on the islands of Bass Strait. These communities developed and maintained a distinctive maritime culture centred on islands, boats, fishing, hunting, seasonal movement and yula harvesting.

This history also includes repeated dispossession. Aboriginal families were progressively displaced from Bass Strait islands by colonial land allocation, leasing and private acquisition. Skira records that outsiders came to hold leases over islands previously occupied and used by Aboriginal families, contributing to the forced concentration of Aboriginal people on Cape Barren Island. Subsequent government policies of protection, segregation and assimilation caused further dispossession and disruption.

This history is directly relevant to the present proposal.

Decisions that allocate Aboriginal Sea Country to new industrial uses cannot be separated from the history of Aboriginal exclusion from land, islands and natural resources. Approval without a proper Aboriginal cultural impact assessment would risk continuing that pattern by allowing another industrial use of Sea Country without adequately recognising Aboriginal authority, knowledge, interests and cultural responsibilities.

Skira's research describes yula harvesting as a central social, cultural and economic activity for Tasmanian Aboriginal people. It provided food and income, enabled families to gather on the islands, supported the transfer of knowledge and skills, and maintained connections between Aboriginal people, ancestors and the Bass Strait islands.

Skira concluded that muttonbirding:

- underpinned the economic and cultural foundations of the Bass Strait Aboriginal community;
- supported collective work and shared access to land and resources;
- maintained an enduring sense of history and connection with previous generations; and
- made the mutton bird islands an integral part of Aboriginal connection to Country.

6. Potential impacts on Sea Country

The potential effects of the proposal are not confined to the physical footprint of the pen or the seabed immediately beneath it.

The proposed action would involve feeding, waste discharges, vessel movements and artificial infrastructure. The proponent also identifies risks associated with nutrient enrichment, disease, pathogens and parasites, possible therapeutant use, pollution, marine debris, introduced species, wildlife entanglement and escaped Atlantic salmon.

These are pathways through which Aboriginal Sea Country, cultural foods and cultural values could be affected.

6.1 Nutrient enrichment and waste

Open-net salmon farming releases fish faeces and uneaten feed directly into the surrounding marine environment.

The proponent acknowledges that nutrient enrichment may affect water quality and benthic habitat but considers the risk low because of the open-ocean conditions, proposed monitoring and seaweed cultivation.

That conclusion does not adequately address Aboriginal cultural consequences. Aboriginal people have an interest in the health of the whole marine environment, not merely whether predetermined water-quality thresholds are exceeded at selected monitoring locations.

The proposed increase from 15,000 to 55,000 salmon substantially changes the potential loading of feed and fish waste. Conclusions reached under the lower-density trial should not be extrapolated without independent evidence demonstrating that they remain valid at the proposed biomass.

Likely quantity of waste

The preliminary documentation should quantify the total waste expected from the proposed increase to 55,000 salmon.

Using the proposed harvest biomass of approximately 302 tonnes, an indicative feed-conversion ratio of 1.35 and published estimates that faeces and uneaten feed represent approximately 17.5 to 22.5 per cent of feed input, the trial could generate in the order of 64 to 89 tonnes of solid organic waste over the grow-out period.

This estimate allows for the initial biomass of the fish when stocked. A simpler calculation based on the full proposed harvest biomass produces a slightly higher indicative range of approximately 71 to 92 tonnes.

These figures include only faecal matter and uneaten feed. They do not account for dissolved nitrogen and phosphorus excreted by the fish, carbon dioxide from respiration, fish mortalities, biofouling, bathing or treatment water, disinfectants, medicated-feed residues or other operational wastes.

The actual waste load cannot be reliably determined from the preliminary documentation because the proponent has not provided the expected total feed input, feed-conversion ratio, feed composition, digestibility, anticipated wastage or nutrient mass balance.

The proponent should be required to provide a complete mass-balance assessment that identifies:

1. initial and final fish biomass;
2. expected mortality and harvested biomass;
3. total feed input over the grow-out period;
4. anticipated feed-conversion ratio;
5. expected uneaten feed and faecal production;
6. dissolved and particulate nitrogen, phosphorus and carbon releases;
7. the timing of releases as the fish grow;
8. the proportion expected to settle, remain suspended, dissolve or be biologically absorbed;

9. the amount and timing of nutrient uptake attributable to the proposed seaweed cultivation; and
10. credible upper-bound waste loads under poor feed conversion, adverse weather, disease and elevated mortality scenarios.

Until these figures are disclosed and independently assessed, the decision-maker and the public cannot determine the likely burden placed on Bass Strait or whether the proposed seaweed cultivation could meaningfully offset that burden.

The proponent should provide independent and contemporary modelling of the dispersal, transformation and accumulation of dissolved and particulate waste under the full range of seasonal and extreme conditions. This should address the duration and direction of transport, cumulative nutrient loading and possible effects beyond the immediate trial site.

6.2 Impacts on culturally important species and food webs

The proposal must be assessed at the ecosystem level.

It is not sufficient to consider only direct collision, entanglement or mortality risks. Assessment is also required of indirect effects, including:

- changes to prey abundance or distribution;
- attraction or displacement of marine fauna;
- interactions between escaped salmon and native species;
- food-web effects;
- artificial feeding opportunities;
- pollution and marine debris; and
- changes associated with nutrient and organic enrichment.

Yula, other seabirds, whales, dolphins, seals, fish and marine organisms are components of Aboriginal Sea Country. Harm to these species or disruption of their habitats can have cultural consequences even where a particular species is not formally listed as threatened.

6.3 Disease, parasites and therapeutants

The proposed expansion raises significant unresolved biosecurity questions.

Piscirickettsia salmonis, the bacterium responsible for piscirickettsiosis, has caused serious disease and mortality in Tasmania's farmed Atlantic salmon. The Tasmanian Environment Protection Authority states that antibiotic use increased in 2025 to control the disease. During the summer of 2025–26, the industry reported using approximately 5.4 tonnes of florfenicol following disease outbreaks associated with the deaths of approximately 9,000 tonnes of farmed salmon.

The organism's status and history in Tasmania require greater clarification. Earlier national guidance distinguished the Tasmanian rickettsia-like organism from overseas *P. salmonis* and classified the latter as exotic to Australia. More recent genomic analysis resulted in an east-coast Tasmanian strain being reclassified as *P. salmonis*. The Tasmanian Government now considers the organism naturally occurring in east and south-east coastal waters.

Government information indicates that it was present in east-coast samples from at least 2021 and in the south-east zone from at least 2023. These detection dates do not establish the organism's ultimate origin, how its distribution has changed, or whether salmon-farming activities have amplified or assisted its transmission.

The movement of live fish, vessels, wellboats, water and farming equipment between sites presents foreseeable biosecurity pathways. Tasmania's salmonid biosecurity system includes controls over fish movement and operations across production areas, demonstrating that these pathways require active management. However, the preliminary documentation does not provide sufficient information for the public to assess whether vessels, equipment or fish associated with the proposed Bass Strait trial could transfer pathogens between farming zones or introduce pathogens into Commonwealth waters.

The proponent should therefore be required to disclose:

1. all diseases and pathogens previously detected in fish or equipment associated with the trial;
2. the source hatchery and complete movement history of the proposed salmon;
3. veterinary testing and certification required before transfer;
4. whether fish, vessels, wellboats or equipment will move between Bass Strait and other Tasmanian farming zones;
5. cleaning, disinfection, ballast-water and wastewater protocols;
6. whether freshwater bathing or other treatment will occur at or in connection with the trial;
7. how bathwater and other potentially contaminated water will be treated and disposed of;

8. whether any vessel has previously serviced a site affected by *P. salmonis* or another infectious disease;
9. the circumstances in which antibiotics or other therapeutants may be used;
10. pathways through which pathogens or antibiotic residues could reach wild fish;
11. the susceptibility of native Bass Strait species, including Australian salmon, to the local strain of *P. salmonis* and other salmon pathogens; and
12. notification, containment and stop-work procedures if disease is detected.

Australian salmon are not true salmonids, and current public information does not establish that they are susceptible to the Tasmanian strain of *P. salmonis*. That uncertainty is not a reason to disregard the risk. It is a reason to require host-range testing and assessment before near-commercial numbers of Atlantic salmon are placed in Commonwealth waters.

The proposal should not be approved on the assumption that the pathogen presents no risk to native fish merely because harm has not yet been documented. The consequences of introducing, amplifying or transporting a pathogen into Bass Strait could extend beyond the trial pen and may be difficult or impossible to reverse.

6.4 Escaped Atlantic salmon

Atlantic salmon are not native to Bass Strait. The potential consequences of escape should not be dismissed solely because the establishment of a self-sustaining population is considered unlikely.

The assessment should address whether escaped salmon could:

- temporarily prey upon, disturb or compete with native species;
- interact with commercial, recreational or Aboriginal fishing;
- spread pathogens or parasites;
- affect culturally important food species; or
- travel beyond the immediate project area.

The increase in fish numbers means that the potential consequences of a containment failure would be greater than under the earlier trial.

The preliminary documentation also refers to animal welfare. We submit that the proponent should explain how welfare will be protected at the proposed stocking density, including during rough weather, disease outbreaks, treatment, handling, transport and mass-mortality events.

Recent mass-mortality events, disease outbreaks and reports of poor fish condition demonstrate the need for project-specific welfare standards, transparent reporting and enforceable response thresholds. These claims should be supported by current authoritative sources before lodgement.

We also question whether the behavioural and welfare needs of a migratory species can be adequately met in intensive open-net confinement and asks the proponent to provide the scientific basis for its welfare conclusions.

We acknowledge that salmon are culturally and spiritually significant to many Indigenous peoples of the North Pacific, including Tlingit, Kwakwaka'wakw and Coast Salish peoples. If retained, this comparative statement should be supported by appropriate Indigenous-authored sources and should not imply that those peoples have taken a position on this Tasmanian proposal.

6.5 Infrastructure, marine debris and wildlife interactions

Open-ocean aquaculture infrastructure creates risks from nets, ropes, lines, plastics and other materials. Severe weather, equipment failure and operational incidents may result in debris or entanglement hazards extending beyond the trial footprint.

The seaweed lines are proposed to be contained within the existing pen and kept taut, with daily inspections. However, the assessment should also address credible failure scenarios, including extreme weather, loss of tension, broken infrastructure and debris dispersal.

These risks are relevant to Aboriginal Sea Country because marine animals, seabirds and the health and accessibility of marine waters are components of Aboriginal cultural values and food systems.

6.6 Ocean currents

A 2005 study modelled the winter–spring circulation of Bass Strait using tracers to estimate how external water masses replace water within the Strait. It identified the central Strait as a "stagnation area" characterised by weak currents and long flushing times, of the order of approximately 160 days. The authors said these findings had implications for marine ecosystems and water-mass residence times. Winter-spring flushing of Bass Strait.

A sophisticated 2007 study used a three-dimensional ocean model to examine flushing time, residence time and water age across Bass Strait. It reported modelled average values of approximately:

- 255 days for flushing time;
- 228 days for residence time; and
- 252 days for water age.

The study found substantial spatial and seasonal variation. Much of the older water was flushed during winter and spring, while summer circulation increased the age of water remaining in the Strait. It also identified an area of relatively low flushing in the south-eastern interior, potentially associated with quasi-stationary eddies that retain older water. [academia.edu]

The proposed action would increase the trial from 15,000 to 55,000 Atlantic salmon in one pen, at a near-commercial stocking density. The site is approximately 12.5 kilometres offshore from Burnie, in water about 55–57 metres deep. The stated purpose is to test whether farming at commercially indicative density and biomass is operationally, biologically and environmentally viable. Open-net salmon farming releases:

- dissolved nutrients excreted by fish;
- particulate faecal material;
- uneaten feed;
- feed-derived nitrogen and phosphorus; and
- potentially other substances associated with operations or treatment.

Strong waves and currents may dilute or move material away from the pen, reducing highly concentrated impacts immediately beneath it. But if the receiving water remains within Bass Strait for an extended period, dissolved nutrients and fine particles may be transported, transformed, recirculated or incorporated into marine food webs rather than quickly leaving the regional marine system.

Longer residence time can increase the opportunity for nutrients to:

- support phytoplankton or algal production;
- be recycled through the water column;
- settle in lower-energy locations away from the pen;
- be transported into ecologically sensitive areas;
- interact with nutrients from other sources; and
- contribute to cumulative effects if aquaculture is expanded to multiple pens or sites.

Residence time is widely recognised as relevant to nutrient enrichment because slower exchange gives biological and chemical processes more time to act on nutrients before they are exported. However, the magnitude of that risk in Bass Strait depends on site-specific modelling of waste loads, currents, stratification, seasonal circulation and ecological response.

The concern is that dispersion is not the same as removal.

Peer-reviewed modelling shows that Bass Strait contains slow-flushing and water-retention areas, with relevant timescales measured in months. This creates a credible need to investigate whether salmon-farm nutrients dispersed from the proposed site could be retained, recirculated or transported into other areas, particularly if aquaculture expands.

6.7 National Light Pollution Guidelines for Wildlife

The preliminary documentation does not demonstrate that the proponent has assessed artificial-light impacts in accordance with the Australian Government's *National Light Pollution Guidelines for Wildlife*.

The guidelines apply to externally visible artificial lighting associated with new activities and infrastructure. They contain specific guidance concerning seabirds, offshore installations and vessel lighting. They identify short-tailed shearwaters as vulnerable to artificial light and document the grounding of short-tailed shearwater fledglings under artificial lighting.

Artificial light can disorient seabirds, interfere with navigation, attract birds towards vessels and infrastructure, and contribute to grounding, collision, injury or mortality. The guidelines identify vessel deck lights, spotlights, navigation lights and offshore infrastructure as potential sources of harmful artificial light.

This is directly relevant to the proposed action. The trial will involve offshore infrastructure and repeated vessel operations in Bass Strait. Navigation and safety lighting will be required, and operational or emergency lighting may also be used. The site lies within Sea Country used by yula / short-tailed shearwaters and other seabirds.

The publicly available material does not provide:

1. a complete inventory of fixed, temporary, vessel, safety and emergency lighting;
2. the location, height, direction, intensity, operating hours, colour temperature or spectral composition of that lighting;
3. modelling of direct light spill, reflected light or skyglow;
4. an assessment of seabird presence, behaviour and seasonal vulnerability;

5. an assessment prepared in accordance with the national guidelines;
6. mitigation measures dealing specifically with yula and other seabirds;
7. monitoring and reporting protocols for attraction, grounding, collision or mortality;
8. procedures for the rescue and rehabilitation of affected birds; or
9. an assessment of cumulative artificial light associated with future commercial-scale expansion.

A general wildlife interaction plan is not an adequate substitute for a lighting assessment. Wildlife observations conducted during normal operations may also fail to detect birds that are disoriented, displaced, grounded on vessels, injured or killed outside the immediate observation area.

Before approval is considered, the proponent should be required to commission an independent artificial-light impact assessment consistent with the *National Light Pollution Guidelines for Wildlife*. The assessment should be undertaken by appropriately qualified seabird ecologists and lighting specialists and should address fixed infrastructure, visiting vessels, navigation lighting, night work and credible emergency scenarios.

At a minimum, enforceable controls should require:

- lighting to be limited to the minimum necessary for human and navigational safety;
- unnecessary deck and operational lights to be extinguished;
- lights to be shielded and directed downwards;
- the lowest practicable intensity to be used;
- blue-rich and high-colour-temperature lighting to be avoided;
- timers, curfews and motion controls to be used where practicable;
- windows and other internal light sources to be screened;
- unnecessary night operations to be avoided during periods of increased seabird vulnerability;
- all bird groundings, collisions, injuries and deaths to be recorded and publicly reported; and
- stop-work or additional mitigation measures to apply where seabird interactions or specified light thresholds are exceeded.

Until that assessment is completed, the proponent cannot reasonably conclude that the proposed action presents a low risk to yula and other seabirds from artificial light.

7. Cultural harm is broader than physical heritage damage

The preliminary documentation appears to treat environmental impacts primarily as biophysical or operational matters. That approach is inadequate.

Aboriginal cultural heritage is not confined to archaeological objects, artefacts or discrete sites on land. It includes living relationships with Sea Country, islands, species, seasons, food resources, travel routes, cultural knowledge, family histories and responsibilities to care for Country.

An impact may be culturally significant even if no archaeological place is physically damaged.

Cultural harm may arise through:

- degradation of water or seabed conditions;
- harm or increased risk to culturally important animals;
- interference with fishing, harvesting or other cultural practices;
- loss of confidence in the health or safety of Sea Country and traditional foods;
- interruption of knowledge transfer between generations;
- exclusion of Aboriginal people from decisions about Country;
- cumulative industrialisation of a cultural landscape; and
- the precedent created for future commercial aquaculture development.

The proponent has not demonstrated that these matters have been investigated through a process led by, or conducted with the informed participation of, Tasmanian Aboriginal people.

8. Inadequate Aboriginal engagement and assessment

The proponent has not undertaken a comprehensive Aboriginal cultural values and Sea Country impact assessment or obtained Aboriginal agreement to the proposed use of Sea Country.

The documentation indicates that the Palawa community has been contacted. However, our organisations are not aware of having received meaningful engagement from the proponent about the proposed action. The proponent should be required to

identify when, how and with whom the claimed contact occurred, what information was provided, what response was received and how any Aboriginal concerns influenced the proposal.

General community consultation is not a substitute for direct engagement with Aboriginal people and organisations. Nor should Aboriginal people be expected to identify every cultural value and potential impact during a short public-comment period after the project has already been designed.

A culturally appropriate process would have commenced before site selection and project design. It would have enabled Aboriginal people to determine how cultural knowledge should be provided, protected and used. It would also have allowed Aboriginal concerns to influence whether and how the proposed action proceeded.

At a minimum, the proponent should be required to:

1. fund an independent Aboriginal cultural values and Sea Country impact assessment;
2. ensure that its scope and method are determined with appropriate Tasmanian Aboriginal representatives;
3. consider tangible and intangible cultural heritage;
4. examine effects on cultural foods, yula, other culturally important species and Aboriginal marine practices;
5. include food sovereignty and the continuing accessibility and safety of Aboriginal cultural foods;
6. protect confidential cultural information;
7. provide sufficient time and resources for informed Aboriginal participation; and
8. publish a transparent account of how Aboriginal concerns have changed the proposal.

9. EPBC, UNDRIP and Closing the Gap

United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

We are not aware of having been approached by the proponent about the proposed expansion, although its preliminary documentation says it contacted our organisation.

The lack of genuine consultation – even better, collaboration – perhaps explains why the proponent has confused Palawa people, who it refers to “palawa kani”, which is the language we speak.

A significant gap in the proposed engagement approach is the absence of any demonstrated consideration of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which Australia endorsed in 2009.

The documentation states that research activities will follow industry-standard environmental management systems and procedures. For engagement with Aboriginal people, we submit that the relevant best-practice framework is UNDRIP, including the principle of free, prior and informed consent. The proponent should engage early, provide complete and accessible information, respect Palawa decision-making structures and demonstrate how Aboriginal views can influence whether and how the proposal proceeds.

EPBC

We used the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) Protected Matters and Search Tool to map an area approximate to the proposed test areas at approximately 12.5km north of Pataway / Burnie.



The report produced by the Protected Matters Search Tool identifies protected matters that may occur within, or may relate to, the search area. A PMST result is a screening tool rather than proof that every listed species is present at the project site. The proponent must undertake site- and pathway-specific assessment of the species and habitats that may actually be affected.

Birds (37)

- Sooty Shearwater (*Ardenna grisea*)
- Flesh-footed Shearwater (*Ardenna carneipes*)
- Short-tailed Shearwater (*Ardenna tenuirostris*)
- Fork-tailed Swift (*Apus pacificus*)

- Sharp-tailed Sandpiper (*Calidris acuminata*)
- Red Knot (*Calidris canutus*)
- Curlew Sandpiper (*Calidris ferruginea*)
- Pectoral Sandpiper (*Calidris melanotos*)
- Common Sandpiper (*Actitis hypoleucos*)
- Eastern Curlew (*Numenius madagascariensis*)
- Antipodean Albatross (*Diomedea antipodensis*)
- Gibson's Albatross (*Diomedea antipodensis gibsoni*)
- Southern Royal Albatross (*Diomedea epomophora*)
- Wandering Albatross (*Diomedea exulans*)
- Northern Royal Albatross (*Diomedea sanfordi*)
- White-bellied Storm-Petrel (*Fregetta grallaria grallaria*)
- Blue Petrel (*Halobaena caerulea*)
- Southern Giant-Petrel (*Macronectes giganteus*)
- Northern Giant Petrel (*Macronectes halli*)
- Fairy Prion (*Pachyptila turtur*)
- Sooty Albatross (*Phoebetria fusca*)
- White-faced Storm-petrel (*Pelagodroma marina*)
- Common Diving-petrel (*Pelecanoides urinatrix*)
- Gould's Petrel (*Pterodroma leucoptera*)
- Soft-plumaged Petrel (*Pterodroma mollis*)
- Brown Skua (*Stercorarius antarcticus*)
- White-fronted Tern (*Sterna striata*)
- Australian Fairy Tern (*Sternula nereis nereis*)
- Buller's Albatross (*Thalassarche bulleri*)
- Northern Buller's Albatross (*Thalassarche bulleri platei*)
- Indian Yellow-nosed Albatross (*Thalassarche carteri*)
- Shy Albatross (*Thalassarche cauta*)

- Grey-headed Albatross (*Thalassarche chrysostoma*)
- Campbell Albatross (*Thalassarche impavida*)
- Black-browed Albatross (*Thalassarche melanophris*)
- Salvin's Albatross (*Thalassarche salvini*)
- White-capped Albatross (*Thalassarche steadi*) [Protected...26th 2026 | PDF]

Fish, Sharks and Syngnathids (26)

Threatened fish and sharks

- Australian Grayling (*Prototroctes maraena*)
- Blue Warehou (*Seriolella brama*)
- White Shark / Great White Shark (*Carcharodon carcharias*)
- Grey Nurse Shark (*Carcharias taurus*)
- Porbeagle Shark (*Lamna nasus*)
- School Shark / Tope (*Galeorhinus galeus*) [Protected...26th 2026 | PDF]

Marine fish (listed marine species)

- Western Upside-down Pipefish (*Heraldia* sp. 1)
- Big-belly Seahorse (*Hippocampus abdominalis*)
- Short-head Seahorse (*Hippocampus breviceps*)
- Crested Pipefish (*Histiogamphelus briggsii*)
- Rhino Pipefish (*Histiogamphelus cristatus*)
- Knifesnout Pipefish (*Hypselognathus rostratus*)
- Deepbody Pipefish (*Kaupus costatus*)
- Bass Strait Pipefish (*Kimblaeus bassensis*)
- Australian Smooth Pipefish (*Lissocampus caudalis*)
- Javelin Pipefish (*Lissocampus runa*)
- Sawtooth Pipefish (*Maroubra perserrata*)
- Halfbanded Pipefish (*Mitotichthys semistriatus*)
- Tucker's Pipefish (*Mitotichthys tuckeri*)
- Red Pipefish (*Notiocampus ruber*)

- Common Seadragon (*Phyllopteryx taeniolatus*)
- Pugnose Pipefish (*Pugnaso curtirostris*)
- Robust Pipehorse (*Solegnathus robustus*)
- Spotted Pipefish (*Stigmatopora argus*)
- Widebody Pipefish (*Stigmatopora nigra*)
- Ringback Pipefish (*Stipecampus cristatus*)
- Hairy Pipefish (*Urocampus carinirostris*)
- Port Phillip Pipefish (*Vanacampus phillipi*)
- Longsnout Pipefish (*Vanacampus poecilolaemus*) [Protected...26th 2026 | PDF]

Marine Mammals and Cetaceans (16)

Whales

- Minke Whale (*Balaenoptera acutorostrata*)
- Sei Whale (*Balaenoptera borealis*)
- Blue Whale (*Balaenoptera musculus*)
- Pygmy Blue Whale (*Balaenoptera musculus brevicauda*)
- Fin Whale (*Balaenoptera physalus*)
- Pygmy Right Whale (*Caperea marginata*)
- Southern Right Whale (*Eubalaena australis*)
- Humpback Whale (*Megaptera novaeangliae*)
- Killer Whale / Orca (*Orcinus orca*) [Protected...26th 2026 | PDF]

Dolphins

- Common Dolphin (*Delphinus delphis*)
- Short-finned Pilot Whale (*Globicephala macrorhynchus*)
- Risso's Dolphin (*Grampus griseus*)
- Dusky Dolphin (*Lagenorhynchus obscurus*)
- Bottlenose Dolphin (*Tursiops truncatus*) [Protected...26th 2026 | PDF]

Seals

- Long-nosed Fur Seal (*Arctocephalus forsteri*)

- Australian Fur Seal (*Arctocephalus pusillus doriferus*) [Protected...26th 2026 | PDF]

Reptiles (1)

- Green Turtle (*Chelonia mydas*) [Protected...26th 2026 | PDF]

Summary

The report identifies approximately:

- **37 listed threatened species**
- **36 listed migratory species**
- **58 listed marine species**
- **13 cetacean species**

Closing the Gap

Outcome 15 of the National Agreement on Closing the Gap recognises that Aboriginal and Torres Strait Islander people maintain distinctive cultural, spiritual, physical and economic relationships with their land and waters.

That commitment is relevant to this proposal because Bass Strait is Aboriginal Sea Country. Palawa relationships with its waters, islands, species, cultural foods and harvesting practices remain living and interconnected. Yula harvesting is at once cultural, spiritual, physical and economic.

The Closing the Gap framework also commits governments to shared decision-making and improved Aboriginal access to information. Yet the proposed action appears to have been designed without meaningful Tasmanian Aboriginal participation, and the preliminary documentation omits information necessary to assess its effects on cultural values, cultural foods and Sea Country.

Closing the Gap is not a separate approval test under the EPBC Act. It is, however, an important Commonwealth policy commitment. The Commonwealth should explain how approving an industrial use of Aboriginal Sea Country without a comprehensive Aboriginal cultural assessment or meaningful shared decision-making would be consistent with that commitment.

10. Cumulative impacts and future commercial development

The proposed action should not be assessed in isolation from its broader purpose and likely consequences.

The project is intended to test whether salmon aquaculture at a commercially indicative stocking density and biomass is viable in Commonwealth waters. A successful trial may be relied upon to support future expansion of open-net salmon farming in Bass Strait.

The assessment must therefore consider:

- the precedent established by approving commercially indicative stocking;
- the consequences of replicating the model across multiple pens or sites;
- cumulative nutrient, wildlife and biosecurity risks;
- the aggregate demand for feed and marine feed ingredients;
- additional vessel movements and shore-based infrastructure;
- cumulative effects on fisheries, food webs and other marine users;
- the progressive industrialisation of Aboriginal Sea Country; and
- whether effects considered limited at one pen would remain acceptable if the model were expanded.

Describing the proposed action as temporary or as research does not eliminate its capacity to cause environmental and cultural harm or facilitate longer-term industrial development.

11. Precaution and deficiencies in the preliminary documentation

The proposed action raises significant uncertainty concerning:

- the composition and provenance of salmon feed;
- total feed consumption and feed wastage;
- effects of increased biomass;
- the dispersal and accumulation of waste;
- ecological and food-web interactions;
- disease and treatment events;
- escaped Atlantic salmon;
- infrastructure failure;
- effects on yula and other culturally important species; and
- cumulative commercial development.

- artificial-light impacts and compliance with the National Light Pollution Guidelines for Wildlife;
- the presence, habitat use and vulnerability of protected species identified through the PMST screening process;

The proponent frequently characterises risks as low because management plans and monitoring programs will be implemented. Monitoring, however, generally detects impacts after they have occurred. It does not establish that impacts will be prevented, acceptable or reversible.

The assessment must also distinguish between an absence of evidence and evidence of absence. Where Aboriginal cultural values, food systems and cultural practices have not been comprehensively identified, the proponent cannot reasonably conclude that effects on those values will be negligible.

Given the cultural importance of Bass Strait, the increase in stocking density, the outstanding questions about feed, the ecological uncertainties and the potential precedent for future commercial development, assessment by preliminary documentation is inadequate.

12. Requested decision

We submit that the proposed action should not be approved on the present information. The current preliminary documentation does not enable the Minister, Aboriginal people or the public to assess the proposal's direct, indirect and cumulative impacts on the Commonwealth marine environment, listed migratory and marine species, Aboriginal Sea Country, cultural heritage or cultural food systems.

Before any approval is considered, the Commonwealth should require the following:

- a comprehensive environmental impact assessment addressing the significant-impact criteria for the Commonwealth marine environment and listed migratory, threatened and marine species, with independent scrutiny and meaningful opportunities for public and Aboriginal participation;
- an independent Aboriginal cultural values and Sea Country impact assessment, with its scope, methodology, governance and treatment of confidential knowledge agreed with appropriate Tasmanian Aboriginal representatives;
- a genuine engagement process consistent with UNDRIP and the principle of free, prior and informed consent, including disclosure of the proponent's claimed previous contact with Aboriginal groups, and a transparent account of how Aboriginal views have influenced the proposal;

- full disclosure and independent assessment of salmon feed, including total quantity, ingredients, provenance, fishmeal and fish-oil inputs, source fisheries, fish-in-fish-out and feed-conversion ratios, sustainability, traceability, digestibility and anticipated wastage;
- a complete nutrient and waste mass balance covering initial and final biomass, mortalities, harvested biomass, feed inputs, faeces, uneaten feed, dissolved and particulate nitrogen, phosphorus and carbon, biofouling, treatment water, medicated-feed residues and other operational waste streams;
- independent, site-specific, three-dimensional modelling of dissolved and particulate waste transport, transformation, deposition and accumulation, distinguishing local dispersion from export out of Bass Strait and addressing seasonal circulation, residence times, stratification, extreme events and cumulative loading;
- quantified evidence of the proposed seaweed cultivation's likely nutrient uptake, timing and effectiveness, without assuming that seaweed will offset fish-farm discharges;
- an ecosystem-level assessment of effects on yula and other culturally important and EPBC-protected species, including effects on prey, food webs, breeding, feeding, migration, resting behaviour, important habitat and Palawa cultural harvesting;
- an independent artificial-light impact assessment consistent with the National Light Pollution Guidelines for Wildlife, covering fixed infrastructure, vessels, navigation, operational and emergency lighting, with enforceable mitigation, monitoring, rescue, reporting and stop-work requirements;
- a comprehensive biosecurity and disease assessment covering the source and movement history of fish, vessels, wellboats, water and equipment; veterinary testing; cleaning and disinfection; bathwater and wastewater disposal; pathogen transfer; native-species susceptibility; and notification, containment and stop-work procedures;
- full assessment of antibiotic and other therapeutant use, including triggers for use, substances and quantities, residues, toxicity, persistence, antimicrobial resistance, effects on wild species and cultural foods, and enforceable alternatives and limits;
- assessment of escape, predation, competition, pathogen-transfer and ecological risks from Atlantic salmon, together with credible containment-failure scenarios and effective recovery and notification requirements;
- assessment of animal-welfare risks at the proposed density, including rough weather, disease, handling, transport, treatment and mass-mortality events, supported by enforceable standards and transparent reporting;

- assessment of credible worst-case and emergency scenarios, including mass mortality, disease outbreak, containment failure, infrastructure damage, marine debris, treatment failure, extreme weather and prolonged inability to access the site;
- a cumulative-impact assessment examining the reasonably foreseeable consequences of commercial-scale expansion in Bass Strait, including multiple pens or sites, aggregate feed demand, waste production, vessel traffic, lighting, disease risk, wildlife interactions and progressive industrialisation of Aboriginal Sea Country;
- assessment of impacts on Aboriginal cultural foods and food sovereignty, including the accessibility, safety and continuity of fishing, gathering, yula harvesting, food sharing and intergenerational knowledge transfer;
- independent monitoring designed and governed with Aboriginal participation, with baseline data, public real-time or timely reporting, culturally relevant indicators, enforceable thresholds and transparent auditing;
- clear and enforceable avoidance, stop-work, notification, remediation, rehabilitation and financial-assurance conditions if environmental, welfare or cultural thresholds are exceeded; and
- a requirement that any later expansion, replication, extension or commercial operation be referred and assessed as a separate action, rather than being authorised incrementally through this trial.

If these matters cannot be addressed through further assessment and conditions that provide a high level of confidence that serious or irreversible environmental and cultural harm will be avoided, approval should be refused.

13. Conclusion

The Tasmanian salmon industry presents itself as a producer of food for Tasmania, Australia and the world. That claim must be examined critically.

Tasmanian salmon production has grown substantially while many Tasmanian households have continued to struggle to afford sufficient, nutritious food. Further salmon production cannot be assumed to improve food security, particularly where the resulting product remains unaffordable to many people experiencing poverty.

Nor can salmon be produced without other food inputs. The preliminary documentation fails to provide adequate information about what the proposed 55,000 salmon will eat, where that feed will come from, how much will be required and what ecological and cultural consequences may follow.

Bass Strait is not merely a prospective aquaculture site. It is Aboriginal Sea Country and a living cultural landscape.

Its waters and islands have sustained Aboriginal communities, food systems, maritime knowledge, livelihoods, cultural practices and connections between generations. Yula and yula harvesting occupy an especially important place within that history and living culture.

The health of Aboriginal people and culture is connected to the health of Country. Damage to marine waters, food webs, species or ecological relationships can cause cultural harm even where no physical heritage site is destroyed.

The present documentation does not adequately identify Aboriginal cultural values, examine Aboriginal food systems or demonstrate that the proposed action will protect them. It relies too heavily on management and monitoring after approval, gives insufficient attention to uncertainty and fails to confront the proposal's role in facilitating future industrial aquaculture in Bass Strait.

Producing more salmon does not necessarily mean feeding the people who need food. It should not be permitted to come at the expense of Aboriginal Sea Country, cultural foods or one of the world's oldest continuing Indigenous food-harvesting traditions.

We therefore ask that the proposed action not be approved based on the current preliminary documentation.

Ends.

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