

18 January 2023

Department of Natural Resources and Environment Tasmania
Tasmanian Government

Online submission via [Have your say](#)

Draft Tasmanian Salmon Industry Plan

Thank you for the opportunity to provide feedback on the Tasmanian Government's Draft Tasmanian Salmon Industry Plan and the Draft Workplan.

The RSPCA is Australia's most trusted animal welfare charity. We have worked alongside government and policy makers for more than 150 years to improve animal welfare in Australia through contemporary animal welfare science. Today, there is significant scientific evidence highlighting that fish are sentient animals capable of experiencing pain and suffering.

It is disappointing that the draft Plan and the draft Workplan have little to no obvious focus on the welfare of farmed fish. Commitment to continuous improvement in salmon welfare should feature in the Plan/Workplan to facilitate ongoing farming and regulatory improvements that better reflect contemporary animal welfare science.

Please find RSPCA Australia and RSPCA Tasmania's combined feedback. We look forward to continuing to be consulted on fish welfare matters, and welcome questions or the opportunity to meet to discuss in the meantime.

Yours sincerely



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Tasmanian Government
Draft Tasmanian Salmon Plan (the Plan) & Draft Workplan

RSPCA Australia and RSPCA Tasmania submission

Submitted online on 18/01/2023 through <https://nre.tas.gov.au/aquaculture/salmon-farming/new-salmon-plan/have-your-say>.

Priority Outcome 1: Sustainable Industry

The draft Plan states that the Tasmanian Government intends to support “finfish developments in areas that are further away from land, higher energy, more exposed and deeper” (p8). The draft Workplan includes a planning process for future opportunities in state waters (PO1:1.1.7), however there is no mention of any consideration of the potential fish welfare implications and management of wildlife interactions of such systems. Will this be included under PO2: 2.3.6 and PO2: 2.3.7?

The draft Plan states that the Tasmanian Government intends to support “efficient land-based production” (p8), yet the draft Workplan makes no mention of how it will address the potential fish welfare implications that must be recognised and managed in raising fish to heavier weights in tanks in recirculating aquaculture systems before (or potentially without) transfer to seawater. Will this be included under PO2: 2.3.7?

The draft Plan states that the Tasmanian Government intends to promote farming practices that will “encourage welfare outcomes” (p8), yet the draft Workplan makes no mention of the welfare outcomes that will be sought with respect to either fish or wildlife, nor the criteria that will be used to assess those welfare outcomes. It is noted that the draft Workplan includes a number of health-related actions (Table 1b), however good fish welfare encompasses more than good health. Will this be included under PO2: 2.3.6 and PO2: 2.3.7?

The draft Plan mentions “animal welfare requirements” exclusively in the context of “market security” (p9) rather than as an aim in itself. A key factor underpinning the sustainability of the aquaculture sector is ensuring the welfare of fish as well as ensuring that wildlife are not adversely impacted by farming operations. The draft Workplan (Table 1b) lacks any action that would suggest that animal welfare requirements will be considered or put in place. Will this be included under PO2: 2.3.6 and PO2: 2.3.7? Our previous submissions provided a range of actions that could assist in this space. As an aside, images of live fish held out of water (e.g. p11 of the draft Workplan), regardless of context, showing an animal in distress (lack of oxygen) underlines the importance of demonstrating an understanding of animals’ behavioural needs and incorporating that understanding into everyday practice.

Priority Outcome 2: Healthy Ecosystems

The draft Workplan includes an action (PO2: 2.3.6) to develop a Wildlife Interaction Standard. Will this Standard include requirements for managing the welfare of wildlife who interact with fish farming systems?

The draft Workplan includes an action (PO2: 2.3.7) to develop a Freshwater Finfish Farming Standard. Will a similar Standard for the marine phase be developed and will these Standards include requirements for ensuring good fish welfare? Again, our previous submissions provide a range of suggestions regarding development of standards, assessment protocols, and alignment with existing certification programs.

The draft Workplan includes an action (PO2: 2.5.1) that aims to provide “advice and guidance to address wildlife interactions”. Will this action also include research into impacts of current deterrent devices on seals and other marine life? Will this action include research into alternatives to current deterrent devices?

Priority Outcome 3: Prosperous Communities

The draft Workplan includes an action (PO3: 3.1.1) which will continue to deliver accredited training pathways. Any training of persons responsible for the management and/or handling of fish must include consideration of fish welfare requirements and ensure competence in required tasks, including for example: handling of fish, observation of fish, maintaining fish environment, identification of normal and abnormal fish behaviour, fish care and treatment of injury, disease or distress, and euthanasia of fish.

Priority Outcome 4: Contemporary Governance

Regarding PO4: 4.1.2 in the draft Workplan, we support the comprehensive and regular (including real-time) online publication of independently verified information relevant to environment and fish care. The Tasmanian Government could consider expanding the Salmon Farming Data Portal to include, for example, information on water temperature, dissolved oxygen, antibiotic usage, seal deterrent usage, and kilogram wild fish (in fish meal and fish oil) to kilogram farmed salmon body weight (FIFO) ratio.

The draft Workplan includes an action (PO4: 4.2.1) intending to provide secure funding for IMAS. Fish welfare must be a key consideration in decision making around future production systems. Our previous submissions highlighted a number of research gaps that would help inform best practice finfish farming and the regulation thereof. Secure funding of independent research, including fish welfare research, and the subsequent implementation of research results into industry practice and industry governance is crucial for maintaining continuous improvement across the aquaculture sector.

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