

17 October 2017

Hon. Jeremy Rockliff MP
Deputy Premier of Tasmania
Minister for Primary Industries
15 Murray Street
Hobart TAS 7000



Via email: Jeremy.rockliff@dpac.tas.gov.au

Dear Minister,

Re: Sustainable Industry Growth Plan for the Salmon Industry

Tourism Industry Council Tasmania (TICT) welcomes the opportunity to comment on the Tasmanian Government's draft '*Sustainable Industry Growth Plan for the Salmon Industry*'.

TICT is the peak body that represents and acts for the Tasmanian tourism industry. The Council is a not-for-profit organisation that promotes the value of tourism in the Tasmanian community. TICT provides a strategic direction and united voice for the sustainable development and growth of the Tasmanian tourism industry and in advocating policy on behalf of the industry.

TICT has a large, representative-based board, bringing together various industry sectors. This includes representatives of accommodation and hospitality operators; visitor attractions, experiences and tour operators; transport operators, ports, and tourism-related industry associations. We are signatories with the Tasmanian Government on the dual industry-government strategies guiding the growth of tourism and the visitor economy in Tasmania;

- *T21 – The Tasmanian Visitor Economy Strategy 2015-20, and*
- *Parks 21: Joint Action Plan for Tourism in Protected Areas in Tasmania 2015-20*

Response to DRAFT Industry Growth Plan

TICT values and supports a growing, world-class salmon industry in Tasmania.

In an increasing number of regional Tasmanian communities, especially on the West Coast and in the Far South, salmon and tourism are now the two largest growth sectors of the local economy. The extraordinary development of the salmon industry in Tasmania over the past three-decades has coincided with the equally-impressive expansion of our tourism industry, and both industries are now intrinsic to the diversified and sustainable economic base of many regional communities across the State.

The salmon industry is also an important part of our tourism industry and the visitor experience in many parts of Tasmania. Salmon is a pillar of Tasmania's global brand for premium produce that drives destination awareness and visitation to the State. Visiting the inland Salmon Farms at Plenty or Deloraine, or seeing a salmon farm up-close on Macquarie Harbour or the d'Entrecasteaux Channel, is

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a greatly-valued feature of many holiday experiences within Tasmania. The decision by the Salmon producers over twenty-years ago to allow tour operators to expose visitors to live salmon farms up-close has no doubt helped generate greater recognition and appreciation of Tasmanian salmon among its consumers, while also providing a unique visitor experience in some of the more remote parts of Tasmania.

As the peak industry body for the Tasmanian tourism industry, TICT strongly rejects any suggestion that a growing salmon industry in Tasmania is somehow incompatible with a growing tourism industry in this State, and attempts by some antagonists to divide communities along pro-salmon, or pro-tourism, lines. We would contend the experience in Tasmania over the past thirty-years has proven a world-class and well-managed salmon industry in Tasmania has enhanced and not diminished our tourism offering, and supported visitor growth and investment in our industry.

It is in the tourism industry's interest for Tasmania to encourage and facilitate economic diversification in regional areas and investment across a range of industries, including Salmon, that brings economic and social vibrancy to regional destinations.

TICT does, however, recognise the pace and scale of growth in the salmon industry in Tasmania has created apprehension and concern among many Tasmanians, including within our own industry. Several tourism operators have expressed concerns to us about the management and regulation of the salmon industry, the potential impact of future growth on sensitive natural environments, and ultimately the brand and reputation of destinations and the State.

In this context, TICT looks to this 'Sustainable Industry Growth Plan for the Salmon Industry' as an important and timely opportunity to address these concerns and ultimately strengthen public confidence and community pride in our Salmon industry.

In looking at specific components of the draft plan, we offer the following contributions:

- **New Farm Approvals**

TICT does not purport to have the scientific or industry expertise to endorse or otherwise the proposed 'Grow' and 'No Grow' Zones for the salmon industry.

We expect some tourism operators will have concerns about the implications of proposed 'Grow' zones within their local area, or waters they operate within. Many of these operators are likely to have made their own representations to this consultation process, and/or directly to the Salmon industry. We also anticipate local tourism industries will have reservations about potential farming operations within 'grow zones' in their local areas.

While the proposed 'Grow' and 'No Grow' zones provide a framework for guiding future growth of the industry, it does not negate the need for a robust and transparent approval process for any proposed new fish farm within these zones. It is critical the State Government ensures any tourism operator, or individual member of the community, with legitimate concerns about a new fish farms proposed within a 'grow zone' in their local area can have absolute confidence their concerns will be fully and appropriately considered and tested in the approval process.

The Marine Farming Planning Review Panel must have an appropriate broad mandate to consider the direct and indirect impact of a proposed fish farm on a local area, including other industry sectors, businesses and residents, alongside ecological and sustainability considerations. We would suggest the standard set should be that any proposed salmon farm development off-shore should be subject to at least the same public consultation and scrutiny as an equivalent land-use development on-shore. This could mean the industry growth plan recommend further work on reviewing the approval process, including the potential for limited appeal-rights, and the Minister's discretion to approve leases and licenses.

- **Regulation of operations**

TICT welcomes the principle of a 'zero tolerance' approach to marine debris and environmental degradation caused by fish farm activities in sensitive environments, particularly Macquarie Harbour.

As an industry we aspire to the highest standards around the impact of our activities in high value natural areas, including Macquarie Harbour, and we expect other industries working in these globally significant areas to be held to the same standard.

Reports emanating from the salmon industry itself about the 'dead zone' caused by their operations in Macquarie Harbour stretching into the World Heritage Area is alarming, and has the potential to undermine and damage the cherished reputation and brand of the Tasmanian Wilderness World Heritage Area.

We welcome the establishment of the Finfish Farming (Compliance & Monitoring) Unit within the Environment Protection Authority, along with the additional resources committed by the State Government towards monitoring and enforcement of licensing and legislative conditions within Macquarie Harbour and other sensitive areas. We expect these practices will be effective in reversing the impact of 'dead zones' or further measures must be considered. We note the draft plan is limited in detail about what 'zero tolerance' ultimately means beyond existing legislative provisions.

- **Brand**

TICT values Tasmanian Salmon as a significant feature of our tourism brand.

We believe this should be reflected in the 'Sustainable Industry Growth Plan for the Salmon Industry', recognising that salmon is an iconic export product of Tasmania with a deep association with our core destination brand attributes of clean, green and pristine. Effectively managing further growth and investment in the industry so it continues to be perceived as making a positive contribution to the broader Tasmanian brand must be a priority for the Salmon industry, the Tasmanian Government, and all stakeholders.

While we are not aware of any evidence the current public debate around the industry has affected its reputation with potential visitors to the State, by recognising the industry as a brand attribute for Tasmanian tourism ensures it has brand value for our industry, and should be monitored accordingly. The reforms to Brand Tasmania, hopefully, provides an effective

framework for closer collaboration between the tourism and salmon industries around brand awareness, marketing and consumer intel.

- **Industry Relations**

TICT has engaged with the Salmon industry on occasions regarding specific concerns individual operators, or groups of operators, have expressed about salmon industry operations in their local area. In our experience the salmon industry at an operator level has been very forthcoming in providing information to our industry about its practices and responding to individual concerns. We encourage the Salmon industry at an operator level to continue this proactive engagement on the ground with other industries and community stakeholders to effectively manage localised issues and concerns by tourism operators about salmon farm operations in their local area. However, on state and industry-wide issues we believe there are opportunities to strengthen the collaboration and cooperation between our two industries.

Since 2002, TICT has maintained highly effective cross-industry engagement with the Tasmanian forest industry through the Tourism-Forestry Protocol Agreement (TFPA). The TFPA was born out of attempts by some members of the community to heighten negative perceptions about forest industry practices impact on the Tasmanian tourism industry. The TFPA has served as an effective framework for managing both micro and high-level issues between our two industries and pre-empting potential risks for conflict between these two major Tasmanian industries. A global research project in 2014 found the TFPA to be the best-practice example of effective tourism-forestry industry relations anywhere in the world.

In 2013 and in response to local tourism industry concerns about the impact of salmon farm expansions on the West Coast, the TICT board formally resolved to approach the Salmonoid Growers Association of Tasmania about the potential to develop a similar protocol agreement between our two industries. In addition to inviting the salmon industry to join us in replicating some of the effective practical measures in our long-standing agreement with the forest industry, to put in place a framework to effectively manage the inevitable issues and risks of conflict between our two industries. The Salmon Industry at the time determined not to proceed with a formalised agreement and since then their industry peak body has been in a state of flux.

The Tasmanian tourism industry remains committed to strengthening our relationship with the Tasmanian salmon industry, and suggests the reinvigoration of an effective Tasmanian salmon industry peak body must be priority of this industry growth plan. If that were to occur, we would be keen to engage the industry at a high level about opportunities to learn from the tourism-forestry relationship in Tasmania and the potential to replicate this effective model between our two industries to ensure a strong and robust collaboration in the future between Tasmania's world-class tourism and salmon industries.

TICT welcomes the opportunity to contribute to this industry growth plan, and is able to provide further information and input on request.

Yours sincerely,



Luke Martin
Chief Executive Officer
Tourism Industry Council Tasmania

CC:

- Hon Will Hodgman MP, Premier, Minister for Tourism
- Hon. Elise Archer MP, Minister for the Environment