



The Honourable Joanne Palmer MLC  
Minister for Primary Industries and Water  
Minister for Disability Services  
Minister for Women  
Public Building, 53 St John Street  
Launceston TAS 7250

9 June 2022

Dear Minister,

Congratulations on your appointment to the Cabinet, and thank you for agreeing to meet with Oysters Tasmania later this month.

Oysters Tasmania is the peak body for Tasmania's growers of bivalve shellfish. We have around 50 Australian-owned growers, ranging from large to small, who employ around 300 Tasmanians to produce around \$35 million of Pacific oysters each year.

I write to outline some of the things we would like to discuss at our meeting.

### **Conference**

Firstly, we would like to invite you to be our keynote guest at the 2022 Shellfish Futures conference. The conference is the critical gathering of Tasmania's oyster growers and associated industry, researchers and regulators. Around 100 attendees will be coming to St Helens for our first gathering since 2019 due to COVID. We would be honoured if you could attend any or all of our conference, from the opening on the conference of the morning of Thursday 1 September, to the Gala Dinner at the conclusion of the conference on Friday 2 September.

### **Regulation**

Secondly, we would like to mention some current regulatory issues facing oyster growers.

#### *Leasing of State waters*

When oyster growers lease State waters, they are subject to marine farming management controls. The Government has proposed the introduction of one set of management controls state-wide, with little differentiation between the controls to apply to salmon farming and the controls to apply to oyster farming. Yet salmon farming and oyster farming are like chalk and cheese, with the impacts of oyster farming generally being small, both in absolute terms and relative to salmon farming. For this reason, Oysters Tasmania has lodged a submission requesting that the tight management controls that are clearly directed at salmon farming not be applied to oyster farming.



### *Food safety*

The various groups that grow or extract seafood from State waters are subject to varying degrees of food safety regulation and associated charges. This ranges from the rigorous regulation faced by oyster growers, associated with annual fees and levies of nearly \$1 million, to the negligible regulation faced by recreational fishers. But harmful algal blooms in State waters threaten the health of seafood consumers and the reputation of Tasmanian seafood regardless of which group grew or extracted the seafood. As such, we would like current discussions about harmful algal blooms to lead to food safety regulation and associated charges being more evenly applied across all seafood grown or extracted from State waters.

### *Environment*

Oyster farming has negligible environmental impact: it involves no feed, chemicals, or waste; has a negligible carbon footprint; and is supportive of native wildlife. However oyster farming is harmed by environmental damage caused by other parties. For instance, months of oyster farm closures are attributable to dairy industry run-off in the North West and to TasWater spills in the D'Entrecasteaux Channel, Pitt Water, etc. As such, we favour more rigorous environmental regulation and enforcement, as well as the funding of infrastructure upgrades to reduce effluent in State waters.

### *General licensing*

Despite being subject to the specific regulations and charges outlined above, oyster growers are also required to have a general licence to farm (unlike the great majority of farm industries), to pay more than \$140,000 in annual licence fees, and to satisfy licence conditions that relate more to wild fishing or duplicate requirements of other regulation. For this reason, Oysters Tasmania has lodged a submission requesting that oyster growers no longer be required to have a general licence to farm.

### **Industry growth**

Finally, when we meet later this month we would like to touch on our vision for a sustainably profitable industry. We plan to work with your officials to develop an industry growth plan by June 2023. With the right regulatory arrangements, the oyster farming industry can be a booming industry of which Tasmania can be proud.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Duncan Spender".

Duncan Spender  
CEO, Oysters Tasmania