



The Honourable Jane Howlett  
Minister for Primary Industries and Water  
Minister for Racing  
Level 5, Salamanca Building  
4 Salamanca Place  
Hobart 7000

7 June 2024

Dear Minister,

Oysters Tasmania is the peak body for Tasmania's oyster farmers — locals who sustainably grow a premium Tasmanian product and employ Tasmanians across regional Tasmania.

Congratulations on your election to Lyons, where we understand you already have strong connections with oyster farmers, who span the Division from St Helens to the Tasman Peninsula.

Congratulations also on your appointment to the Ministry. Our Oysters Tasmania board is keen to meet with you to discuss the following requests relating to your Ministerial responsibilities for biosecurity, food safety, and TasWater, at a time and place convenient to you (including on farm if you wish).

We would also be honoured if you would speak as a special guest at our annual conference, to be held at the Eastcoaster in Orford on Friday 13 and Saturday 14 September.

### **Biosecurity**

#### ***Pipe Clay Lagoon***

We request that your officials in the Chief Vet's Office, alongside officials from Marine Resources Branch, coordinate and fund investigations into the causes of stagnation and mortalities observed in recent years in oysters farmed in Pipe Clay Lagoon. To date investigations have been ad hoc and largely funded by industry. Yet federal guidelines (the Aqua Vet Plan) set out a broad role for Chief Vet's Offices and Directors of Fisheries. We appreciate that these areas of the Department are stretched and suggest that IMAS may be able to contribute resources to this task.

- Given the references to fisheries and Marine Resources Branch, I have copied Minister Abetz into this correspondence.



### ***POMS***

Following the 2016 outbreak of Pacific Oyster Mortality Syndrome (POMS), the Chief Vet's Office, with the support of industry, assigned an 'infected', 'POMS-free' or 'intermediate' status to each Tasmanian oyster-growing area, and banned the movement of oysters from 'infected' areas to other areas, and from 'intermediate' areas to 'POMS-free' areas.

More than half of Tasmania's oyster-growing areas were classed as 'intermediate', meaning there was little or no evidence of disease, but a risk of introduction of the disease. However, since 2019 there has been no structured surveillance to see if the disease has spread to 'intermediate' areas. This is concerning because:

- if any 'intermediate' area should actually be classed as 'infected', it should be subject to the most stringent movement restrictions, and
- if any 'intermediate' area should actually be classed as 'POMS-free', it should be subject to the lightest movement restrictions.

As such, we request that the Chief Vet's Office undertake surveillance to review the classification of 'intermediate' areas in consultation with industry.

### **Food safety**

#### ***Biotoxins***

Unlike oyster farmers in other states, Tasmanian oyster farmers are required to undertake and pay for more than half a million dollars' worth of biotoxin testing each year. In June 2023 we wrote to your predecessor Minister Palmer requesting less frequent mandatory biotoxin testing in low risk areas and seasons, and no mandatory biotoxin testing when areas are not harvesting oysters for consumption. In October 2023 we were advised that a three-to-six month review would be undertaken. We are yet to see changes and request that changes be made soon.

Our biotoxin testing assists recreational fishers avoid deadly risks. This public benefit is valued at many millions of dollars each year. A recent IMAS review calculated that annual payments of \$110,000 from recreational fishers towards biotoxin testing costs, or annual payments from Government on behalf of recreational fishers, would ensure that all sectors reap the same rate of return from the biotoxin testing regime. The Liberal Government made an election commitment to provide \$110,000 towards the costs of one year of biotoxin testing. We welcome this commitment but note that, as biotoxin testing costs are incurred each year, and as recreational fishers are saved from deadly risks each year, this commitment should be annual.



### ***Refrigeration***

A recent research paper recommends oyster farmers in the south of the State refrigerate oysters within seven or 12 hours of summer harvests, instead of 24 as currently required. Yet since the current advice and regulations on temperature control have been in place, there has been no reported illness attributed to the temperature control of oysters at southern farms through to the wholesale stage. Moreover, for farmers who currently deliver their product within the 24-hour window without refrigeration, the high costs of acquiring refrigerated storage and transport could see many of them leave our industry. Given this, we request that any regulatory changes in response to the research be implemented with long lead times, take into account that risks vary between regions, and be accompanied by:

- nationwide enforcement of post-farm temperature control;
- funding for investments in refrigerated storage and transport; and
- rationalisation of food safety audit requirements, incorporating online compliance.

### **TasWater**

TasWater spills of untreated sewage into oyster-growing waterways are frequent — far more frequent than extraordinary weather events that could justify such spills. To ensure food safety, oyster farms are closed in response. Such closures impose six-figure costs on our industry each year, yet no compensation is provided for these costs.

Given this, we request that you use your powers under the *Water and Sewerage Industry Act 2008* to require the Office of the Tasmanian Economic Regulator to report to you on TasWater sewage spills into oyster-growing waterways, to support your development and coordination of policies relating to the regulation of the water and sewerage industry.

Yours sincerely,

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

Duncan Spender  
CEO, Oysters Tasmania