



Minister Abetz
Minister for Business, Industry, and Resources
Level 10 Executive Building
15 Murray St
Hobart 7000

15 November 2024

Dear Minister,

Marine Farm Lease and Licence Law

Under the Tasmanian Salmon Industry Plan 2023, the Government committed to continued improvement of legislation through reviewing the *Living Marine Resources Management Act 1995* (LMRMA) and *Marine Farming Planning Act 1995* (MFPA).

In February 2022 the Government announced a review of the LMRMA. In March 2022 Oysters Tasmania provided a submission to this review. In this submission Oysters Tasmania recommended the removal of the requirement for oyster growers to obtain a licence under the LMRMA, as without such licensing oyster growers would continue to be effectively regulated under the MFPA and the Primary Produce Safety Act, and requiring oyster growers to obtain a general permission to farm is unusual and unwarranted. We request that this recommendation be adopted.

With regards to the MFPA, we request amendments to make the property rights of marine farm leases as strong as fishing quotas, so as to improve a farmer's access to capital and reduce the farmer's cost of capital. Such amendments could involve reducing your unilateral powers to cancel leases and to refuse the transfer of leases, and preventing the sale of a lease without the consent of a financial institution that has a registered proprietary interest in the lease. The latter form of amendment has been enacted in South Australia, to the benefit of the oyster industry there.

Prior to such statutory change, we also request a related policy change: the reinstatement of the practice of registering a financial institution's interest in a marine farming lease simply to ensure that the financial institution is informed prior to any transfer of the lease.

Yours sincerely,

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

Duncan Spender
CEO
Oysters Tasmania