



## Oysters Tasmania input — 9 October 2025

### *Pre-consultation - Tasmanian Shellfish Aquaculture Plan*

***We invite you to fill out this short survey at Shellfish Futures to inform the development of a Tasmanian Shellfish Aquaculture Plan***

***When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.***

#### ***1. What does a responsible and environmentally sustainable shellfish aquaculture sector look like?***

A responsible and environmentally sustainable shellfish aquaculture sector looks like what we have, because the Tasmanian shellfish aquaculture sector is responsible and environmentally sustainable. What a Shellfish Aquaculture Plan needs to do is take what it already socially and environmentally sustainable and help make it economically sustainable.

- The Tasmanian shellfish aquaculture sector is responsible.
  - The sector is a part of the community, providing employment across regional Tasmania, and producing a food that is healthy delicacy.
  - The sector is a good neighbour, as the Department would attest, based on the paucity of complaints received about the sector.
- The Tasmanian shellfish aquaculture sector is environmentally sustainable.
  - Oyster farming is no-feed farming — all we put in our baskets are our oysters.
  - Our oysters play a regenerative role for the broader ecosystem, including by playing a positive role with respect to both the nitrogen and phosphorus cycles.
  - Farming oysters involves lower greenhouse gas emissions than the farming of any other meat, fish, or crustaceans.
  - Pacific oysters are a part of the Tasmanian marine environment, having been introduced to Tasmania by the precursor to the CSIRO in the 1940s, and becoming well-established soon thereafter, well before the commencement of farming in the late 1970s.
  - Oyster farmers regularly undertake shore clean ups, with the great majority of the material they collect being household rubbish.
  - Oysters are the canary in the coalmine. They do no environmental damage, and serve as an early warning sign of environmental damage caused by others.

#### ***2. How can we balance expansion with protecting our waterways and adapting to climate change?***

The question implies there is conflict, when in reality there is synergy.



- There is no conflict between expansion of the Tasmanian shellfish aquaculture sector and the protection of our waterways. The shellfish aquaculture sector currently protects our waterways, and its expansion would enhance this protection, for the reasons outlined at answer #1.
- There is no conflict between expansion of the Tasmanian shellfish aquaculture sector and adapting to climate change. Adapting to climate change should include growing more oysters in Tasmania, as:
  - Tasmanian waters are and will continue to be relatively cool and less prone to intense storms and cyclones compared to other oyster-growing waters in Australia and the rest of the world;
  - the production of other protein sources involves high vulnerability to climate change, limited adaptation options, and an exacerbation of climate change through significant net greenhouse gas emissions.

### ***3. How can shellfish aquaculture best support regional economies and create new jobs?***

The shellfish aquaculture sector can best support regional economies and create new jobs through industry growth.

Industry growth will come from current and potential growers seeing rising shellfish prices and falling costs.

Government supports shellfish prices through setting and enforcing food safety rules, compliance with which ensure that the consumers of Tasmanian farmed oysters have a consistently positive experience. This food safety role should continue.

Government can also support shellfish prices through trade support and promotions. To complement generic trade programs and Brand Tasmania efforts, Government should partner with industry on a trade support and promotions program targeting increased downstream and final customer demand for Tasmanian oysters across Australia and internationally.

Government can also have a detrimental effect on oyster industry prices and costs, which in turn hinders industry growth and employment.

For instance, Government failures to prevent pollution – including human and agricultural effluent, and industrial and agricultural chemicals and metals — hurt the industry's prices, costs, and production.

- Pollution impedes shellfish product quality and perceptions thereof, and so impedes the price received for shellfish. Pollution leads to significant sampling and testing of oyster-growing waters and oyster meats, the cost of which is unjustifiably imposed on industry. Pollution also leads to closures that reduce production (as the conveyor belt of oyster production from spat



to maturity is halted) and reduce prices (as sales at peak times are thwarted, and the reliability of supply is undermined).

- The Government is responsible for preventing pollution. Whenever the Government fails to prevent pollution, the Government is imposing unwarranted costs on the shellfish industry. Government should meet its responsibility to prevent pollution so as to avoid imposing costs on the shellfish industry and holding back industry expansion. If and when Government fails to prevent pollution, Government should compensate industry and pay for pollution-related sampling and testing, so that, in net terms, Government avoids imposing costs on the shellfish industry and holding back industry expansion.

Government also undermines industry growth and employment through imposing more than \$1 million in fees annually, the great majority of which are unwarranted.

- The ShellMAP levy represents three quarters of the fees imposed on the Tasmanian oyster industry. The ShellMAP levy pays for sampling and testing that needs to occur, but that should not be paid for by industry. All the sampling and testing is either necessitated by pollution risks for which the Government, rather than industry, is responsible, or by natural risks, the investigation of which serves a public benefit.
- Lease fees represent ten percent of the fees imposed on the Tasmanian oyster industry. Lease fees exceed the value of the water, as proven by the recent paltry prices paid to transfer leases, indicating that the Government is using lease fees to tax the returns generated by other inputs to oyster farming. Lease fees also exceed the costs the Government needs to incur as landlord over the water, given that regular inspections of oyster leases do not serve a public purpose.
- Licences fees represent more than ten percent of the fees imposed on the Tasmanian oyster industry. There should be no licence requirement to farm oysters; most other farmers do not need Government permission to farm. As the licence is unwarranted, so too is the licence fee.

Government undermines industry growth and employment through the imposition of unwarranted red tape.

- Oysters Tasmania has advised the Red Tape Reduction process of twenty examples of unwarranted red tape across five portfolios that hinder oyster farming:  
[https://www.oysterstasmania.org/uploads/1/1/1/5/111586309/250324\\_oyster\\_tasmania\\_input\\_to\\_red\\_tape\\_reduction\\_coordinator.pdf](https://www.oysterstasmania.org/uploads/1/1/1/5/111586309/250324_oyster_tasmania_input_to_red_tape_reduction_coordinator.pdf)

Government can support industry growth by strengthening the property rights of oyster farm leases, which will improve grower access to finance. Growers should be able to assure financial institutions that the Government will not allow the grower to sell a lease the financial institution is treating as security without the financial institution being advised of the proposed sale. There should be less



ministerial discretion to cancel or vary leases, and concessional finance offered by the Tasmanian Government should be available to oyster growers.

Government can support industry growth by ensuring that planning law recognises the importance of the oyster industry accessing appropriately zoned land, obtaining approval for the development of oyster farm land bases on that land, and accessing available boat ramps.

Government can also support industry growth by ensuring that the treatment of Seafood and Maritime Training is no less favourable than the treatment of TAFE.

#### ***4. What areas of research should Tasmania prioritise to ensure we have a competitive and resilient shellfish aquaculture sector?***

Before considering priorities for research, development, and extension (RD&E), it is important to consider whether the current mix of RD&E and non-RD&E spending best ensures we have a competitive and resilient shellfish aquaculture sector. It does not. A shift in spending towards spending on trade support and promotions would improve the prospects for the Tasmanian shellfish aquaculture sector.

The RD&E that would best ensure we have a competitive and resilient Tasmanian shellfish aquaculture sector is selective breeding.

- Selective breeding is the development of a new generation that is better than the previous generation and so should be treated as RD&E.
- Tasmanian Government support for Pacific oyster selective breeding should be increased to match the New South Wales Government's support for Sydney Rock Oyster selective breeding.
- Pacific oyster selective breeding is undertaken by Australian Seafood Industries (ASI). There should not be a requirement for Tasmanian Government support to ASI to be in the form of IMAS staff and facilities. Instead, Tasmanian Government support should be forthcoming even if ASI engage the staff and facilities of Tasmanian commercial hatcheries.

The next highest RD&E priority should be the demonstration of the profitability of farming currently-underutilised Tasmanian deep water oyster leases. Tasmanian Government support for a Blue Economy Cooperative Research Centre project to be led by Oysters Tasmania is required, both to ensure that the demonstration trials are not threatened by prohibitive fees, and to ensure that the project component exploring best practice regulation is well informed.

A further RD&E priority should be the maintenance of a standing capacity at IMAS to undertake oyster health and oyster food safety research. Currently IMAS undertakes oyster health and oyster food safety research on an ad hoc rather than continual basis, as seen with the 'IMAS Services to ShellMAP' project and the IMAS Investigation into Pipe Clay Lagoon. While the associated work has been excellent, the hand-to-mouth funding arrangement has made it difficult to attract and retain quality researchers. To protect IMAS's reputation for excellence in oyster health and oyster food



safety research, there should be guaranteed ongoing funding for a rolling program of oyster health and oyster food safety research, with the specific topics changing depending on the issues currently affecting the industry.

The share of funding under the Sustainable Marine Research Collaboration Agreement devoted to the shellfish aquaculture sector should increase to reflect not just the current size of the sector, but also to reflect the growth potential and the sustainability of the sector, both of which are unmatched by any other sector.

The Tasmanian Government should continue to tilt the scales in Tasmania's favour with respect to the RD&E supported by the Federal Government's Fisheries Research and Development Corporation (FRDC).

- The Tasmanian Government should continue to supplement the direct Tasmanian grower contributions to the Industry Partnership Agreement (IPA) between Oysters Australia and the FRDC. This supplementation supports research projects selected by Oysters Australia to benefit the shellfish aquaculture sector nationally, such as current IPA funding of research into the use of genomics in Pacific oyster selective breeding.
- The Tasmanian Government, through the Tasmanian Research Advisory Committee (TasRAC), should also continue to tap the FRDC's 'public good' fund for projects to benefit the Tasmanian shellfish aquaculture sector, such as Pipe Clay Lagoon investigations by Marine Solutions.

***5. What systems (or practices) are most important to protect shellfish stock health (and ensure it remains disease-free)?***

Government disease surveillance is required to protect shellfish stock health. Some such surveillance was undertaken in 2016. This informed the classification of areas as POMS-infected, POMS-free, and indeterminate, and bans on movements from POMS-infected areas to other areas, and from indeterminate areas to POMS-free areas. The continued existence of an indeterminate category prevents relaying that could be both safe and profitable. The introduction of ongoing Government disease surveillance, or at least a time-limited surveillance project to provide a statewide snapshot, could eliminate the indeterminate category and provide the scientific basis for allowing relay pathways that would be safe and profitable but are currently prohibited.

Protecting shellfish stock health includes preventing industrial chemicals and metals entering oyster-growing areas.

- Publicly-funded trials should be undertaken to expose oysters to allowable levels of industrial chemicals and metals and assess the impact. Any adverse impacts should then prompt reductions in the allowable levels of industrial chemicals and metals.
- There should be regular, publicly-funded surveillance of oyster-growing areas for industrial chemicals and metals, and investigations to determine sources when detected above allowable levels.



- The assessment of industrial chemicals and metals in oyster-growing areas as part of triennial reviews is currently industry-funded but should be publicly-funded.

The national AquaVet Plan obliges Tasmania's Chief Veterinary Officer and Head of Marine Resources to respond to mortality events with "all necessary epidemiological investigations and diagnostic procedures" and to "collect appropriate samples to ensure that a diagnosis can be made as quickly as possible, assist with the clinical evaluation of affected animals, assist with ongoing epidemiological investigations, including risk assessment and determination of the source of the outbreak (including assessment of wild animal vectors), and obtain independent diagnoses."

- <https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/animal-plant/aquatic/aquavetplan/control.pdf>

Investigations as per the current IMAS investigation into Pipe Clay Lagoon, arranged by Marine Resources Branch under the Sustainable Marine Research Collaboration Agreement, should be the norm, and should arise "as quickly as possible." The aforementioned call for the maintenance of a standing capacity at IMAS to undertake oyster health and oyster food safety research would assist in this regard.

The current IMAS investigation into Pipe Clay Lagoon is hindered by the fact that it is not routine for all growers to take regular samples and to gather and record quantitative mortality and growth data. This means there is a lack of crucial data prior to and at the outset of a mortality event. Any Government commitment to carry out its obligations under the AquaVet Plan can be coupled with an industry commitment to ongoing sampling and ongoing gathering and recording of quantitative mortality and growth data.

Protecting shellfish stock health involves banning the entry of oyster material into Tasmania only when there is a material risk to the incumbent oyster population or environment, and this risk outweighs the benefit offered by the import. Note that an import that helps the oyster industry and its expansion has an indirect environmental benefit given that the industry itself is environmentally-beneficial.

While harmful algal blooms rarely threaten shellfish stock health, they can threaten the health of other marine species. The detection of harmful algal blooms by the oyster industry can help the long-term management of such threats to other marine species. As such, the oyster industry's detection of harmful algal blooms should be publicly-funded.

#### ***6. Where could regulatory processes be improved on to reduce barriers (without compromising standards)?***

Oysters Tasmania has advised the Red Tape Reduction process of twenty examples of unwarranted red tape across five portfolios that hinder oyster farming:

[https://www.oysterstasmania.org/uploads/1/1/1/5/111586309/250324\\_oyster\\_tasmania\\_input\\_to\\_red\\_tape\\_reduction\\_coordinator.pdf](https://www.oysterstasmania.org/uploads/1/1/1/5/111586309/250324_oyster_tasmania_input_to_red_tape_reduction_coordinator.pdf)

Regulations regarding the movement of stock within Tasmania can be improved without compromising standards if the aforementioned recommendation for disease surveillance is adopted.



Oyster farm lease law and administration can be improved, as outlined previously, to improve grower access to finance.

***7. How can industry strengthen community confidence, especially around environmental care and transparency?***

The Tasmanian oyster industry is a part of the community, not separate from it. The industry employs around 350 Tasmanians across the State, most of our farms are owner-operated, and most farm owners are Tasmanian.

Community confidence in the Tasmanian oyster industry is high. Feedback that industry participants receive directly from the public, and indirectly from local, state, and federal politicians, is uniformly positive.

Nonetheless, some of those who are aware of the Tasmanian oyster industry may not be aware of all of the environmental credentials of the industry. This gap could be addressed through the Tasmanian Shellfish Aquaculture Plan outlining the industry's environmental credentials, and through the creation of a promotional program for the shellfish sector.

***8. What opportunities exist to support Aboriginal involvement and leadership in the Tasmanian shellfish aquaculture sector?***

Oysters Tasmania has sought to meet with the Land and Sea Aboriginal Corporation of Tasmania to learn more about the Indigenous Skills and Employment Program.

A program that encourages and identifies Aboriginal interest in engagement with the industry, and then provides support to turn any such interest into reality, would be welcome.

***9. How can Tasmania build stronger domestic and international demand for shellfish?***

As outlined in answer #3, Government can support oyster prices and demand through:

- continuing its food safety role,
- trade support and promotions, and
- meeting its responsibility to prevent pollution.

***10. How would you like to be consulted and involved in the Tasmanian Shellfish Aquaculture Plan?***

Oysters Tasmania has sought and gathered grower views on the Tasmanian Shellfish Aquaculture Plan and the issues to be covered in it, and will continue to do so. Oysters Tasmania will collate and pass on these views to Government at every opportunity (just as it is doing now).

Oysters Tasmania also offers to convey Government messages to growers on the Plan.

Oysters Tasmania will assist with any direct consultations between Government and growers.

Oysters Tasmania would value meeting with Government on the Tasmanian Shellfish Aquaculture Plan at every opportunity.



There should be joint sign-off between Government and Oysters Tasmania on the Plan to reflect the consensus we aim to achieve and to ensure that both Government and industry implement the Plan.

***11. Do you have any further comments you would like to make?***

Thank you for this engagement and please continue the engagement.

The development of a Shellfish Aquaculture Plan should include data collation and analysis to demonstrate where the industry has been, where it is now, and where it could be. The NSW DPI carry this out in NSW and could assist Tasmania in this regard.

***12. Please rate the pre-consultation Shellfish Aquaculture Plan workshop.***

Very positive, as it clearly demonstrated Government interest in partnering with industry to enhance the industry's positive impact for Tasmania.