
EcoNetwork – Port Stephens Inc

PO Box 97 Nelson Bay 2315.

Attention: Joanna Bakopanos
Team Leader, Independent Assessments
Department of Planning and the Environment
Planning Services

31st March 2016

**RE: Application to modify the consents approving finfish
aquaculture
for Pisces Aquaculture Holding Pty Ltd and NSW Department of
Primary Industries (NSW DPI), Providence Bay.**

Dear Joanna,

EcoNetwork Port Stephens is a grassroots network of community groups and eco-businesses addressing local environmental and associated planning issues for the protection and conservation of our unique environmental assets.

In 2012 we declared our opposition to the marine finfish cage trials in Providence Bay in a submission to the DPI emphasising the absence of Ecologically Sustainable Development (EDI) criteria, analysis and application.

On 3 March 2016 we attended a briefing by representatives of Fisheries and Huon about the modification application and to discuss improved technology and farming practices. We note advances (in meal composition) have been designed to reduce reliance on wild-fish in the make up of stockfeed (but question whether Huon will achieve energy conversion ratios that are ecologically sustainable). We also appreciate the effort that has gone into engineering predator-proof pens and feed management.

Nevertheless we continue to be of the view that offshore finfish farming poses an unacceptable risk to the marine environment. We prefer aquaculture to be land based because this virtually eliminates the risk of spreading pathogens, disease, contaminants and toxins. Where there is any risk of spreading pathogens among wild fish, we believe the precautionary principle must apply.

We are also concerned that increasing the size and number of pens introduces a level of industrialisation that is totally out of character with the Port Stephens precinct, and that once the trial phase is completed, more fish pens will be added to create a gigantic fish farm and an even higher risk of contamination and other impacts yet to become evident.

Following are our key objections:

Industrialisation a bad fit

The offshore section of the Port Stephens – Great Lakes Marine Park is a largely unspoiled marine environment characterised by marine sanctuaries at Broughton Island, Cabbage Tree Island and Point Stephens. It's a natural capital asset in which blue water activities such as whale and dolphin watching, ecotourism, boating and fishing excite locals and visitors but have minimal environmental impact while earning revenue. To locate 2 aquaculture sites of 62 hectares each, with twelve 120 to 168 metre diameter sea pens, 9 and 7 kilometres offshore between two marine sanctuaries introduces an element of industrialisation that does not fit within this pristine environment and in fact detracts from it. We also believe this is the thin edge of the wedge and that once the 5-year DPI tenure ends the farm will grow into a much larger industry encompassing more of this area that holds so much importance for the local tourism industry.

An imposition on existing eco friendly industries

One of Port Stephens' biggest industries is whale and dolphin watching conducted by firms such as Imagine Cruises, Moonshadow Cruises and Tamboi Queen Cruises. To force these companies and by extension thousands of visitors to cede space to the visual pollution associated with a fish farm is of great concern. We are convinced that the fish farm will attract wild fish and in turn sharks, and pose a risk to unique eco tourism activities such as swimming with dolphins and snorkelling on offshore islands. These activities should not have such a risk imposed on them. Recreational boaters, fishers, spear fishermen and divers will be forced to take note of yellow cardinal markers delineating the proposed modification leases and the hazard contained therein.

Impact on marine habitats

The MA says the risk of a significant impact on marine habitats is thought to be 'low', due to the high-energy location, use of feed barge technologies and the monitoring program, but it still applies a 'moderate' risk tag (p. 66). This tag, it says is due to uncertainty about factors such as feed type, variations due to differing species, how different marine communities will respond and the influence of the NSW high energy coastal environment. Low or moderate? This uncertainty suggests that the proponents can't guarantee a low level of risk to marine habitats and indeed don't know what the impacts will be.

Nutrients contained in their feed including nitrates and phosphates and high levels of excretion from densely populated cages if excessive can cause eutrophication and depleted oxygen levels in the sediment and ultimately the

water column. The pens are to be located in an area where the coastal current is supposed to dissipate the waste but studies have shown that, depending on tidal flow, pockets of pollution can travel considerable distances from the source, potentially affecting coastal waters and the coastlines far from the aquaculture pens themselves (*Dilution cannot be assumed the solution for aquaculture pollution*: <http://www.farmedanddangerous.org/wp-content/uploads/2011/06/FINAL-fact-sheet-pollution-plumes.pdf>)

Chemical usage

The use of chemicals is necessary in aquaculture to manage disease and control pests. The MA mentions that relocation of the leases into deeper waters means less chemicals are needed to treat the fish. It concludes that with this and other safeguards a significant impact on the marine environment and/or the surrounding communities is thought to be therefore low. Yet it still applies a 'moderate' risk tag 'due to the current knowledge base on ecotoxicity, degradation rates and the potential impacts of chemicals in the NSW coastal marine environment'. Again the proponents are demonstrating that they do not actually know what the impacts will be. We believe there should be no ambiguity in assessing risk, and if there is, the precautionary principle should apply.

Disease and introduced pests

The MA (p. 69) notes the existence of pathogen types including parasites, fungi, bacteria and viruses that can infect fish under certain conditions, e.g. when their immune system is depressed. It says moving the sea pens further offshore has the potential to reduce the incidence of diseases, parasites and pests. It concludes that with appropriate risk management, monitoring and strict husbandry the risk of pathogens occurring in wild populations is 'low', but then goes on to apply a 'moderate' risk ranking 'until further research is conducted'. Once again we find this risk assessment process ambiguous.

Migratory whales and predatory interactions

As mentioned in our 2012 submission, we find it illogical that a research farm be located in the north-south path of many migratory whale species. Despite assurances to the contrary (MA p.76), we are not convinced that moving the cages 9 and 7 kilometres off shore diminishes the risk of entanglement, especially given that the number of cages proposed for the period of research will very likely increase after a trial period. The migration of up to 20,000 whales up and down the coast each year provides a whale watching experience supporting a thriving eco tourism industry. Under no circumstances should this be jeopardised.

We acknowledge that the proposed sea pen infrastructure has been designed to specifically mitigate the interactions of predator (sharks, seals, seabirds and dolphins) impacts on cultured stock, but we note the 'moderate' risk tag applied (MA p. 41), indicating that this aspect needs further attention.

Climate change

Scientists generally agree global warming is influencing the frequency and severity of extreme weather events including severe storms. Huon says that monitoring of wave and current data, including data taken from recent storm events has been used to ensure the mooring systems and pens will handle adverse weather conditions. But are these systems capable of withstanding storm events beyond that experienced thus far, events that are well within the realms of possibility? While acknowledging that Huon have no wish to lose any cases and their contents due to negligence or poor anchoring systems, there is little to guarantee the security of these cases in extreme weather events. Much depends on the level of expertise being applied and the level of funding being made available to that aspect of the operation.

Conclusion

EcoNetwork would like to lodge our objection to the Aquaculture Lease Modification Application because we believe the risks of spreading pathogens, disease, contaminants and toxins fail the precautionary principle test, but also because the location of aquaculture farms between two marine sanctuaries and in the middle of an ecotourism activity introduces an element of industrialisation that does not fit within the pristine Providence Bay environment.

Submitted by Nigel Dique, Secretary, on behalf of EcoNetwork-Port Stephens 0423 024819. secretary@econetworkps.org

EcoNetwork-affiliated groups & eco-businesses

a grassroots, community-focused network

National Parks Association (Hunter Branch) Inc.	Hunter Koala Preservation Society Inc.
Native Animal Trust Fund Inc.	Tilligerry Habitat Inc.
Port Stephens Park Residents Association Inc.	Soldiers Point/Salamander Bay Tidy Towns Inc.
Myall Koala & Environmental Support Group	Mambo/Wanda Wetlands Reserves C'ttee Inc
Pindimar/Bundabah Community Association Inc.	Ocean & Coastal Care Initiatives (OCCI) Inc.
Shoal Bay Community Association Inc.	North Arm Cove Residents Association Inc.
Soldiers Point Community Group	Port Stephens Marine Park Association Inc.
South Tomaree Community Association Inc.	Williamstown & Surrounds Residents
Group Inc. No Sandmine in Bobs Farm Inc.	Boomerang Park Action Group Inc
Eco-businesses:	Imagine Cruises (Ecotourism accredited)
Port Stephens Native Flora Gardens Inc.	Salamander Recycling Inc.
Destination Port Stephens Inc.	Wanderers Retreat

Irukandji Shark & Ray Encounters.

On Water Marine Services Pty Ltd.

**EcoNetwork is affiliated state-wide with the Nature Conservation Council of NSW
& with the NSW Better Planning Network.**

For an eco-oriented culture, sustainable communities and the transfer of intact natural systems
to future generations.
