

Our reference: DOC16/153077; EF16/3005
Your reference: SSI 5118 MOD 1 DA 81-04-01 MOD 3
Contact: Jocelyn Karsten (02) 4908 6865

Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Kerry Hamann

Dear Ms Hamann

**REQUEST FOR COMMENTS ON MARINE FINFISH RESEARCH & COMMERCIAL
AQUACULTURE PROVIDENCE BAY
(SSI 5118 MOD 1 AND DA 81-04-01 MOD 3)**

Reference is made to your request dated 8 March 2016, for the Environment Protection Authority (EPA) to provide comments on the modification request and Environmental Assessment for the Marine Finfish Research & Commercial Aquaculture Providence Bay Project (SSI 5118 MOD 1 and DA 81-04-01 MOD 3).

The EPA understands the Department of Primary Industries (DPI) and Huon Aquaculture Group Limited (Huon) are seeking approval to:

- relocate the two approved aquaculture leases further offshore into deeper water (from approximately 3.5km offshore to approximately 7km and 9km offshore);
- increase the size of fish cages (from 80-120m in circumference to 168m);
- increase the number of fish cages (from 8-10 cages to 12 cages at each lease);
- increase the size of the development (from a total of 20-30 hectares to 62 hectares at each lease);
- install permanent feed barges at each site, and
- increase total production (from a combined maximum standing stock of 1,996 to 2,400 tonnes).

The Modification Report states that the proposal would not result in any significant environmental impact. The movement of the leases further off-shore into deeper water and proposed amendments appears to indicate improved environmental outcomes however some of the supporting information is lacking and the proponent needs to provide more information to support this conclusion.

1. Water Quality

The proponents argue that the proposed change will most likely improve water quality outcomes due to increased dilution factors in the larger sea pens. The proponents state that monitoring of currents has been undertaken but no results are presented of this monitoring.

There is a lack of information provided to allow assessment of the likely fate of materials leaving the leases.

Only dissolved nutrients are mentioned in the report. A more substantial risk to the seafloor may be posed by the deposit of organic material onto the seafloor from the fish farms. This is not addressed in this report. The degree to which organic particulates are deposited on the seafloor will depend on the amount of feed that is not ingested as well as the faecal matter produced by the fish within the pens. It will also be dependent upon the currents at the site. There is inadequate information within the provided report to assess this impact.

There is some suggestion that the nutrient concentrations will be monitored as part of the project. The EPA suggests sediment monitoring must be part of any monitoring program and the location of monitoring sites must be determined by consideration of appropriate oceanographic data. The monitoring program should be described. There should be discussion of measures that would be taken to mitigate any adverse impacts found in any monitoring of the project.

2. Site Selection / Construction / Infrastructure Risks – Section 8.1

The habitat of the area of the new proposal and its ecological values are inadequately described. There is a map presented of bathymetry – referenced as DPI (2015), which is not in the references. It is stated that the seafloor is dominated by sediments and appears to be similar to the original site, but it is not clear how this conclusion has been drawn. No data is presented as to the seafloor characteristics. The only description of the ecology of the seafloor is as below and is not adequate.

“Visual interpretation of acoustic backscatter and hillshaded bathymetry data from seafloor surveys of the proposed modification lease sites indicate that the substratum consists of soft sediments only. The sites are dominated by sand and coarse/fine sand with a depth ranging from 38 to 43 m as shown in Figure 11.”

There is no assessment of the impacts of the anchoring system on the seafloor. Impacts may be minimal if the seabed is soft sediment. This needs to be discussed in the assessment report. The EPA was unsure whether the new sea pens will have a different anchoring system to the existing pens and therefore whether they may have a different impact on the seafloor community at the new site within this habitat protection zone.

While overall the EPA notes the movement of the leases further off-shore into deeper water and proposed amendments appears to indicate improved environmental outcomes the EPA suggests clarification by the proponent of the above mentioned issues prior to any determination by the Department of Planning and Environment.

Please contact Jocelyn Karsten on (02) 4908 6865 if you require any further information regarding this matter.

Yours sincerely



PETER JAMIESON
Head Regional Operations Unit – Hunter
Environment Protection Authority