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Department of Planning and the Environment

20-3-2016

RE: Huon Aquaculture/DPI Fisheries Lease modification concerns.

Dear Joanna,

I have a number of concerns with the location of this lease. I understand that a lot of resources by both DPI Fisheries and Huon have been directed into developing a sustainable King Fish Aquaculture farm in Port Stephens waters and I know there will be great reluctance by the proponent to tolerate a move further than that currently being sought. For all the reasons I have outlined I respectfully ask that further review regarding a final home for the expansion of this industry be sought.

Both the proponent and DPI Fisheries at a recent community meeting described this as a research project for the next 5 years. The market demand suggested by the proponent however just in domestic terms will logically lead to pressures to fill a much greater demand than that currently suggested at the research site. I would think that the current proposed expansion to 62 hectares of public waters, 12 cages and 2400 tonnes of fish every 15 months could easily double or treble in 10 years if the market does in fact exist in the quantities as suggested by the proponent.

You may understand our concern as many of us in this community have seen a draft Management plan for offshore aquaculture in the ports waters issued by DPI Fisheries, albeit some years ago, showing numerous cages all the way from Cabbage Tree island to Broughton Island, about 10 miles distant. I know DPI Fisheries managers assure us this plan has been withdrawn however we can see that the possibility for further expansion clearly exists with such a large market. The navigational hazards, compromise of pristine waters and annexing of public waterways would I believe generate considerable angst in this community.

I would respectfully request that waters south of the port in Stockton Bight might present a better option and should be explored for a potential new site. That a research buoy similar to that currently being used to monitor waters at the proposed new site in Providence bay be deployed to gather information during the trial period. A site in Stockton Bight at the proponents proposed ideal depth of 40 metres could pose less navigational risk both to boaters and whales and would be closer to Newcastle, the port being used to service the fish cages with feed barges. There is huge potential for expansion and it's outside the PSGL Marine Park which promotes the natural marine environment.

The following are my primary concerns:

1/ Most scientists agree there is always a risk of a transfer of Pathogens and lice from the aquaculture pens to wild fish attracted to the pens because of its reef like nature and feed fall out. This has happened in Canada's British Columbia waters with Salmon farming and is so serious a concern that the neighbouring US state of Washington has I understand banned any further Salmon farming Aquaculture in its waters.

2/ There is potential for inbreeding with wild fish stock if there is a break in the pens. The escape of farmed fish with chemically supported immune system's mixing or breeding with wild fish is a concern shared amongst conservation biologists as it could and has happened always to the detriment of wild fish populations.

3/ The assumption by the proponent that the faecal matter dropping out of the pens will be disposed of by nature and the tides seems simplistic. Doing the math there are 12 cages proposed in the trial farm, when fully up and running with 2400 tonnes of fish produced every 15 months and at a feed rate of 1.6 to 1, suggests around 1400 tonnes of crap will be generated during the life cycle of one commercial quantity of fish. Maybe this isn't much but it seems like a lot to me.

4/ Navigation issues. The proposed location for the leases to be installed is directly on a course from the Port Stephens heads to Broughton Island. There is a lot of traffic between the bay and Broughton Island and beyond. Broughton is increasingly used by visitors and hut owners. Already there are significant navigational difficulties especially at night through a local fish trap zone where unlit traps are spread over a wide area directly adjacent to the area proposed by the proponent to move the leases.

5/ Whales, seals and dolphins use the area, 20,000 plus Humpback whales migrate through these waters from May to November and many would in fact go right through this site so they will come into contact with the cages at some time, whether this interaction has any detrimental effect to their behaviour or their travel patterns remains to be seen. Although the proponent does not foresee difficulties with entanglement, there are broader concerns as little is known of the importance to mothers and calves of safe rest areas along migratory paths such as the waters directly north of the port. Females with new born calves have been observed resting and sheltering behind the islands in southerly storms when southbound.

6/ Loss of public waters. Several cruise operators including Moonshadow Cruises, Tamboi Queen Cruises and my own company Imagine Cruises have used these waters for over 20 years taking visitors whale and dolphin watching. Over the last 10 years Dolphin Swim Australia PL together with Imagine Cruises have used the same area to conduct swimming with dolphin programs. These combined industries generate over \$5 Million a year to our essential visitor economy and any threat to this known local economy should be taken seriously. The installation of these two private leases means these waters will be annexed and lost forever to other users.

7/ There will inevitably be an increased risk to participants in "The swim with wild dolphins" program conducted by Dolphin Swim Australia due to the attraction of large predators to the area, White Sharks and Tiger sharks will by nature see the pens like a giant reef following the wild fish that will be drawn to the pens. These huge pieces of equipment and dozens of anchor lines will literally act as giant fish attracting devices. Although the predator nets will doubtless keep the larger animals and birds from directly attacking the farmed fish, there will be an increase in predators which could make swimming with dolphins in the area more dangerous.

SUMMARY:

We believe a more suitable site exists for this farm in Stockton Bight. The proponent intends to use Newcastle for feed barges and fish recovery and for the transport and repair of the mass of infrastructure so we would suggest a location in Stockton Bight would put the fish farms much closer to their land base, have room for expansion, reduce risk of pollution to Broughton island and yet still remain close enough for DPI Fisheries to transport fingerlings from the port.

At a depth of 40 metres in the Bight it will be out of the direct navigational traffic of both recreational boats, commercial shipping and the main migratory passage of whales. There is far less recreational and commercial vessel traffic from Newcastle to Port Stephens than from the Port to Broughton Island.

Port Stephens offshore waters and our islands are unique and pristine. Our tourism marketing focuses on the “wild escape opportunity” and our natural marine environment is the giant attraction of Port Stephens Visitor economy. Aquaculture is by nature industrial and although it might be proposed as a tourism product by the proponent it really doesn't fit the nature of Port Stephens, especially in the waters proposed.

I sincerely hope you will consider this option and I will make myself available for any further discussion on the matter.

Yours sincerely

Frank Future



Managing Director
Imagine Cruises.



Tourism and the Environment, Natural Partners.

