PROPOSED MODIFICATION TO EXISTING AQUACULTURE LEASE IN JERVIS BAY Draft TC_08 12 2023

NSW Dept of Planning is advertising a proposal for public comment to expand the existing aquaculture lease in Jervis Bay. This has been orchestrated to minimise community input over Xmas, as the deadline for comment is midnight this Monday 11 December 2023.

Apparently the CBPA was consulted in October, I for one was not aware of this until a Facebook post last week alerted their members to an information session last Saturday at the Community Hall. So much for the spirit of co-operation. I have spoken at length today with Sally Monk, the officer at NSW Dept of Planning managing this application by the Dept of Primary Industries on behalf of the commercial operator. She seemed genuinely interested in my concerns, but could offer no guarantee that the advertising period could be extended. Her phone no. is 9274 6431. Calls to her on Monday about the proposal and short advertising periods would be of great assistance to this cause.

Link to website: https://www.planningportal.nsw.gov.au/major-projects/projects/modification-jervis-bay-musselfarms-relocation-and-expansion

So it is really important that you lodge a written objection on the above DPI website before Monday midnight. More detail can be made available, however I have summarised as the most important thing is to lodge some form of objection if you don't want a bigger, closer and uglier aquaculture development in front of our beautiful Beach and Bay. This is a template for an objection that you can use/personalise:

I object to any change to the existing commercial aquaculture development at Callala Beach in the Marine Park of Jervis Bay for the following reasons:

1. Lack of balanced and effective communication with stakeholders.

- 2. Insufficient time allocated for public exhibition and for the community to understand impacts and respond.
- 3. Time for public comment conducted over quiet pre-Xmas period (ends 13 December 2023).
- 4. Significant issues such as view loss, changes to dolphin habitat, lighting impacts, and a commitment to no further aquaculture development were ignored by the NSW State Govt agencies when the lease was granted.
- Alternative sites within 140sqkm of Jervis Bay were not seriously investigated in response to community concerns.
 Given previous failure to listen to the community, where is assurance that we will be listened to this time?
- The current DoPl application focuses on benefits that will serve the interests of the developer/lessee, and fails to demonstrate concern that the impacts of this proposal will have on local communities.
- the highly impactful existing leases of 40Ha are proposed to be increased to 70Ha: a 75% increase in area.

9. A new, lease area will be constructed between the two existing leases, occupying the entire view corridor from all Callala Beach public access points to the iconic Jervis Bay Heads.

10. The proposal is the size of the entire Callala Beach village.

11. Both existing leases are to be increased in size by 10Ha each, because of an error by the DoPI and developer in setting out the existing leases. The impact of aquaculture farming on the marine environment is summed up in a recent posting on the internet by a keen diver who states *"On a recent trip to Eden whilst diving in Twofold Bay, I was shocked and disgusted to find once healthy reefs had been inundated with mussels, displacing much weed and marine life from those reefs.*

12. Lack evidence provided in relation to entanglement or death of large marine fauna. New proposal will further increase this risk.

13. New leases have radically altered long-standing movement patterns and behaviour of marine fauna in Jervis Bay, including the much loived resident dolphin population. Dolphins have abandoned Callala Beach and primarily now feed at the development leases. Local residents confirm that the level of previous level of dolphin visitation has been reduced to an estimated 10% of pre-lease frequency. This issue was raised by many objectors during 2014 consultation, but dismissed by DOPI/DOPE on basis of *no evidence to support this claim*.

14. The unobstructed views of Jervis Bay (particularly towards the Heads) were unique and of extraordinarily high value to the wider community and the key natural heritage values of eastern coastal Australia. These no longer exist.

15. View impacts and sharing was never considered worthy of inclusion in the original EIS. Community raised this issue, DoPI subsequently commissioned a visual assessment report that concluded such impacts would be negligible due to distance from shore, use of submerged buoys and a low angle of view from beach. This conclusion is now demonstrably incorrect.

16. This controversial development is located on public land, and the public has a right to expect Government to deliver a financial benefits to the taxpayer commensurate with the financial gains that are enjoyed by the lessee, yet DoPI will not divulge, purportedly for "commercial in confidence" reasons.

17. A copy pf the Lease Permit Conditions dated September 2015 states that the annual lease fee \$56/Ha (56 x 70 = \$3920 pa, including a Research Contribution of \$42/ha = \$2940 pa

18. The lessee has stated that public benefits are provided through employment for up to 30 local residents, and by supporting local businesses who provide a range of services required to operate their business. How these fundamental costs of running a private enterprise at a peppercorn rent could be considered to be of benefit to the wider community and the public is not clear.

19. Commitment to regular community information briefings by the lessee since lease inception have failed to eventuate.

DRAFT RECOMMENDATIONS

- NO CHANGE TO EXISTING AQUACULTURE FOOTPRINT IN FRONT OF CALLALA BEACH.
- NO LEASES TO BE MOVED ANY CLOSER TO CALLALA BEACH THAN CURRENT POSITION.
- VINCENTIA SITE LOCATION BE RETAINED OR RELOCATED TO AN ALTERNATIVE LOCATION (NOT CALLALA).
- INITIATE IMMEDIATE STATE GOVT INTERVENTION TO DIRECT NAVY ADJUSTMENT OF THE NAVAL TRACE LINE IN ORDER TO RETAIN EXISTING CALLALA BEACH LEASE LOCATIONS.
- FURTHER INVESTIGATE ENTIRE RELOCATION TO MORE APPROPRIATE AND LESS IMPACTFUL LOCATIONS IN JERVIS BAY.
 EXTEND ADVERTISING PERIOD TO END LANUARY MINIMUM SUPPORTED BY MEDIA EXPOSURE+LETTER BOX DROPS
- EXTEND ADVERTISING PERIOD TO END JANUARY MINIMUM, SUPPORTED BY MEDIA EXPOSURE+LETTER BOX DROPS.

ATTACHMENT 1 - Impacts of Proposal on Callala Beach Views from Public Areas



Attachment 2 – POSSIBLE ALTERNATIVE LEASE LOCATIONS OVER BENTHIC CONDITIONS (TC 2016)

